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First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

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Charles Isaac

Full name: Charles Isaac

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point to the site area Exmo_20 is much closer to Budleigh Salterton than Exmouth. This means Budleigh is the most convenient and accessible town for future residents of the development. The future residents of Exmo_20 would therefore choose to use the services (Doctors, High Street shops, Schools, parks and beaches) in Budleigh and this would undermine the settlement hierarchy and would lead to the merging of Budleigh and Exmouth which is contrary to Policy OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which is deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to it being a supporting foraging habitat. Developing Exmo_20 is contrary to policy PB01 of the Local Plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to the heritage assets, most notably St John in the Wilderness a Grade 2* listed church and church yard, drastically altering the attractive rural setting for worship, weddings and burials which currently exist. This is contrary to Policy HE02 Exmo_20 would have a very detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside which is contrary to Policy OL01. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * ??Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Exmo_20 proposes the development of 700 homes so would add another 2500 to 3000 people to the local population. The schools and doctors surgeries serving the town are already overwhelmed by demand for services . Where will the new residents go to school or get to see a doctor?

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

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

Amanda Jackson

Full name: Amanda Jackson

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I would like to put forward my views regarding this housing development.

Exmouth is being built upon from all angles : Dinan Way Development and Road. The Curlews. Plumb Park. Orcombe Gardens. Rolle College Campus. Do we really have to build more? This new development will encroach on Green Belt/National Landscape. It will damage the natural landscape of the Pebblebed Commons, and encroach on the beautiful tranquil, and rural environment of Castle Lane and Littleham Churchyard and surrounding fields. This area has always been a quiet and safe route for walking and cycling (and an area to get away from everything within a stone's throw of the town).

I attended the Bloor Homes Consultation at Bidmead Community Centre (I would hope that you did, too?). I saw the plans in full, talked to Bloor Homes and Clinton Devon Representatives. Of course, they all presented this very positively from their point of view. However, nothing will convince me that this development is either desirable, sustainable or necessary. The idea that all the run-off water from the estate will be channelled into Littleham Brook is frankly laughable! Have they looked at the brook recently, and checked the health of the water course? I have been visually (and photographically) been monitoring this stream for over 30 years , and have watched it descend from a lively stream, where you could happily paddle with children, to a dirty stream with indeterminable brown substances rolling down along it. It used to support fish and kingfishers - but I have seen neither for over 6 years now (since the development in Douglas Avenue, when the fields were dug up for drainage, and trees removed). I have video evidence of all this. For the whole of 2024 it was impossible to walk up Maer Lane / Gore Lane without dodging sewage on the road, sewage tankers and the smell of sewage. If we are struggling to look after our sewerage and drainage systems already, how much more pressure will be put on an already failing SWW?

With only one exit onto Salterton Road, this will have a dramatic effect on people travelling to and from Budleigh Salterton. The Knowle turning onto Budleigh road is already difficult to navigate at certain times of day. Imagine the extra number of cars on the road, if each of the 410 houses has just one car! This development will ruin the ambiance of Exmouth, as being unusual in being both a rural and a coastal community. This is driving our farmers out. Where will all the bats, foxes, badgers and deer, that currently live and roam in these areas, go? Will people be happy to have badger thoroughfares running through their gardens?

Fighting for a good quality of life in Exmouth is very stressful these days...as all the things we take for granted are being eroded. We are being hit on both sides. If these changes keep on occurring, then people will no longer seek to come on holiday to Exmouth, and local people will want to leave... Please stop the despoilation of our unique environment before it is too late. Once an area is concreted / tarmacked over, THAT IS IT

Jonathan James

Full name: Jonathan James

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main point of Exmo_20 is much closer to Budleigh Salterton than Exmouth, making Budleigh the easiest town to use. The services of Budleigh would be the choice for residents of Exmo_20 to use putting pressure on Doctors, School, High Street, Beach etc. This undermines the settlement hierarchy and would lead to coalescence of Budleigh Salterton and Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, suitable and achievable in the HELAA.

Exmo_20 is also contrary to POLICY TR01, in that it is too far and too steep from any town centre to use walking or cycling as their choice of transport.

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to hear valid arguments for and against the development.

Katie James

Full name: Katie James

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

Simon James

Full name: Simon James

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

Christina James

Full name: Christina James

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not proceed with exmouth_20b. Exmouth has already seen massive development and infringement on green spaces, these need to be protected. There are areas of brown field sites in the town that would align much more closely with the local plan.

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

Nicola James

Full name: Nicola James

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo_20 I am appalled at how much land will be lost in an area that is unspoilt. Access on to roads will be very dangerous, people coming to Exmouth to visit (ie the tourist industry we rely on so much) will think they are still in their cities and towns not to mention the infrastructure which is already collapsing and Dinan Way Goodmores Estate has just added to that problem although the original plans showed a supermarket and there was talk of a school. Think of the view people will see when they enter the Donsn Way off the new roundabouts rows and rows of houses shadowed by ugly flats which are already a blight on the landscape! The houses have not been built in character with Exmouth so now they add to the style of Byron Way etc which is more Crawley!! Our beautiful town with its lovely buildings and country lanes is being swallowed up and nobody is considering the fact we cant reverse this once it happens. I worry nobody will come here they will go to Budleigh or Sidmouth. Please don't destroy it. If you have to provide more homes do it tastefully with smaller developments and consider the impact it has on the people already living here.

Maureen James

Full name: Maureen James

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Re: Objection to SD29 Strategic Allocations in Whimble particularly Whim_08a

I would like to make my objections to the above proposal.

Professional planning officers have already assessed potential sites in Whimble and recommended that the site was not allocation for a variety of reasons, including being incompatible with spatial strategy and forming part of the green wedge with Cranbrook. The objection is supported by the Parish Council.

The road network around Whimble provides huge challenges as every access is narrow and does not have safe pedestrian access. Any large development within Whimble will cause major issues in terms of access of contractors to any site.

Safe pedestrian access is already a concern within the village, with a rising number of vehicles passing through the village and no pavements with no potential to provide safe access. Due to the narrow access in the Square and through the centre pedestrians have to walk on the road as there are no pavements. Therefore access to the school is likely to be by vehicle.

Transport links are not particularly good; although there is a train service only alternate trains stop at this station and the bus service is limited and ceases at 6pm and does not operate on Sundays.

Wildlife: There is an abundance of wildlife in Bramley Gardens and on the proposed site including woodpeckers, newts, owls, deer, badgers and bats which are regularly seen flying around this area. This would therefore be contrary to policies with regard to protection of irreplaceable habitats for wildlife.

Flooding: The centre of Whimble regularly floods and this proposed development is likely to increase the severity and frequency due to the run off down into the centre of the village. I would like to see evidence of flood risk assessments.

In my opinion Whimble is unsuitable for further large scale development due to the access issues and unless a new access road is constructed into the village from the old London Road providing two lane road with a cycle lane and pavement.

Louise Jamieson

Full name: Louise Jamieson

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

? Revert to Exmo _20b as previously proposed,

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

Sue Jeacock

Full name: Sue Jeacock

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I have no idea whether this is legally compliant. But there is no don't know option in this survey question. I have just watched the EDDC info film on the local plan on you tube and the plans for Feniton do not fit with your stated aims of putting the right development in the right place and limited development in the villages. Feniton is being asked to take a large proportion of new development relative to its size, compared with other similar sized villages. The density of the proposed development at Burlands certainly does not fit with the ideal of the right sort of homes in the right place and and the proposed industrial site off Green Lane, a single track lane with no pavements regularly used by school children, dog walkers and pedestrians is horrifyingly unsuitable. I would question the demand for housing in the area, given that the development at Acland Park faltered, leaving houses unfinished and the developer seemingly gone bust. If he couldn't make his business model work in a property boom, I can't see how new houses proposed now will sell any better. Perhaps the other houses could be finished and sold first? The 60 houses proposed in Fen 08 are in a location EDDC previously argued, with the help of expensive lawyers, at the super enquiry was unsustainable for development. Nothing has changed since, so again this cannot be development in the right place. I also understand our parish councillors were prevented from speaking about the inclusion of Otry 20 in the plan because it is technically classed as Ottery. However it clearly hugely impacts the village and has been included in the Feniton section in your plan.

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

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

have just watched the EDDC info film on the local plan on you tube and the plans for Feniton do not fit with your stated aims of putting the right development in the right place and limited development in the villages. Feniton is being asked to take a large proportion of new development relative to its size, compared with other similar sized villages. The density of the proposed development at Burlands certainly does not fit with the ideal of the right sort of homes in the right place and and the proposed industrial site off Green Lane, a single track lane with no pavements regularly used by school children, dog walkers and pedestrians is horrifyingly unsuitable. I would question the demand for housing in the area, given that the development at Acland Park faltered, leaving houses unfinished and the developer seemingly gone bust. If he couldn't make his business model work in a property boom, I can't see how new houses proposed now will sell any better. Perhaps the other houses could be finished and sold first? The 60 houses proposed in Fen 08 are in a location EDDC previously argued, with the help of expensive lawyers, at the super enquiry was unsustainable for development. Nothing has changed since, so again this cannot be development in the right place.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Hugely reduced number of dwellings for Fen 05 - 15-20 would be what the site could sustain, but only once problems with sewage overflow in that area have been resolved. Otherwise the new estate will be swimming in sewage which might make it a bit tricky to sell the homes. Plans for the industrial site Otry 20 need to be removed from the Local plan, as does Fen 08. As you state yourselves, development needs to be the right sort of development in the right places and Feniton has been shown not to be a sustainable location for additional housing on this scale.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I don't believe you have listened to our parish council at all. And parish councillors were prevented from speaking on Otry 20

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

Polly Jeanneret

Full name: Polly Jeanneret

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would have significant adverse effects on St John

in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

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

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

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

Jane JENKINS

Full name: Jane JENKINS

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

EXMO_20 , would cause huge and irreversible damage to the pebble bed heath land and is in contrast with current policy . The surrounding area will be unable to cope with the increased traffic , let alone the infrastructure which is buckling under the current demands without increasing it . This is billed as an Exmouth development, but is infinitely closer to Budleigh, which is already under stress , the sewerage problem alone is of nightmare proportions .

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

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

paul jenkins

Full name: paul jenkins

Proposal:

5. Development in the Towns and Villages

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

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This part of Devon currently fails to support the current housing and residents in terms of inadequate infrastructure - The road system , and road network around the development would grind to a halt, the highways cannot maintain the current network with low traffic volumes. It pure insanity to consider dropping 700 houses in the middle of this fragile road system. It has been well documented the current sewage system in and around Exmouth/Budleigh cannot cope, with spills into the sea together with constant sewage back ups in houses and flooding a regular occurrence. Again how can any sane council or developer consider the addition of 700 new houses linked to an already ' not fit for purpose ' sewage system would be a good idea or worthy of approval. This proposal would also : Harm protected heath and woodland impact on wildlife , deer acitivity , bird live, incecets, wild bee colonies , Adder and Reptiles. Destruction of historic and ancient trees , hedgerows , and habitat. Local services in terms of schools , Gp surgeries are not able to cope with current workloads ,how and where would potentially over 1500 new residents be able to obtain these services - there is no extension of schools or other necessary infrastructure polcies in place to cope or deal with such a signifcant increase of the local popualtion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There is no

modification that would make this proposal workable without a multi million upgrade of the sewage system , local services and road network. There is no funding available for the above and unless the developer as part of a part 36 agreement is prepared to submit a £30m to £40m contribution to cover this shortfall in services/infrastructure and local services it has no credibility and should be rejected.

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

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Yes, because out of control development where no investment to the wider area in terms of infrastructure improvements to accommodate new residential expansion needs to be stopped

Gordon Jenkins

Full name: Gordon Jenkins

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The allocation of Sidm_31 and its access via Windsor Mead is based on a late, superficial and incomplete consideration by the Highway Authority (Devon County Council), which has not been subject to public consultation until this stage. The Highway Authority's justification for use of Windsor Mead ignores any consideration of the junction of Windsor Mead with the A3052, which does not meet the requisite standards set out in the Manual for Streets (DfT et al 2007) in respect of minor arm visibility splays, which are less than 10m.

I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which "could be developed" which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you

could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy SD06 Sidm_31 should be removed from the Local Plan.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The recommendation to access Sidm_31 via Windsor Mead has ignored the poor (less than 10m) minor arm visibility splays, which do not meet the minimum criteria set out in Manual for Streets (ibid). A link between Sidm_31 and Windsor Mead cannot be achieved without the purchase of land from two Windsor Mead properties; if these plots cannot be secured by negotiation, the local authority would need to use its CPO powers on behalf of the developer.

To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

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Access - Access via Burscombe Lane was quoted as a key reason (quite rightly) for the development being refused previously. This lane is very narrow allowing only single car access, is prone to subsidence and extremely dangerous to exit onto Sidford High Street. You mention Windsor Mead as an alternative entry route but this is also a very

narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area.

Transport - Other potential building sites in Sidmouth fall within easy access to public transport. Sidmouth_31 does not have bus stops close by meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy SD06 Sidm_31 should be removed from the Local Plan.

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

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Yes, but the recommendation to access Sidm_31 via Windsor Mead was inserted into the Regulation 19 Local Plan on the basis of an '11th-hour' email exchange between EDDC and DCC, which means it is not being subject to scrutiny until now. Not good.

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

Jessica Johnson

Full name: Jessica Johnson

Proposal:

5. Development in the Towns and Villages

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

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

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

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

- Contrary to Local Plan Policy PB01: The development should be relocated to an alternative site to avoid harm to the Pebbled Heaths (SAC/SPA).
- Loss of tranquillity and natural beauty: Exmo_20 would destroy the “tranquillity, wildness, and dark skies” of the countryside, which conflicts with Policy OL01.
- Environmental damage: The development would fragment habitats and destroy wildlife corridors, harming veteran trees and species-rich hedgerows—contrary to Paragraphs 13.9 and 13.23 of the Local Plan.
- Failure to meet air quality standards: The Habitats Regulations assessment (30.01.25) confirms that adverse effects on air quality cannot be ruled out, conflicting with Policies OL09 and PB04.
- Impact on heritage site: Exmo_20 would adversely affect St John in the Wilderness, a Grade II listed church and churchyard*, significantly altering its peaceful setting—contrary to Policy HE02.
- Increased flood risk: The site is on the main rainwater catchment for Withycombe Brook, on heavy clay subsoil, making soakaways ineffective and exacerbating flood risks—contrary to Policy AR01B.
- Traffic congestion and sustainability concerns: The development increases car dependency and traffic, as it is over 800m from key services, making walking and cycling impractical—contrary to Policy TR01 and Paragraphs 11.2 and 11.6.
- Encroachment on Budleigh Salterton: The site is closer to Budleigh Salterton than Exmouth, leading to urban sprawl and merging the two areas—contrary to Policy OL05.

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

This development should be modified to remove Exmo_20 from the Local Plan. This will prevent significant environmental harm, preserve the integrity of protected landscapes and heritage sites, mitigate flood risks, ensure sustainable transport planning, and prevent urban sprawl between Exmouth and Budleigh Salterton. The exclusion of Exmo_20 will ensure alignment with Policies PB01, OL01, HE02, AR01B, TR01, and OL05, contributing to a more sustainable and resilient development strategy.

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

Francesca Johnson

Full name: Francesca Johnson

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There has been very limited consultation with arbitrary decisions made on the choice on Housing and Employment sites. The original EDDC plan presented in 2022 showed proposed and rejected development sites in the Sid Valley. Subsequently in October 2024 and after, significant changes a new site was introduced without consultation as follows – Sid_31 – Sidford- adjacent to Windsor Mead – This was listed in the original plan as a ‘Rejected Site’ but then popped up without consultation as a new Housing site in September/ October, 2024. Sidm_31 – Sidford – land by Windsor Mead and Burnscombe Lane. This is outside the built up boundary of Sidford. This implies a loss of National Landscape (former AONB), and is an over development of a small site with poor access. because due process was not followed and proper consultation was not made - and also because many areas within Sidmouth that are close to amenities and not National Landscapewhere 15 houses could be built - this development should be removed from the plan.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Sidmouth_31 from the plan and focus on land close to Alexandria trading estate instead.

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

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Nobody locally was consulted - and property owners purchasing houses next to this site during 2024 were told the building proposal had been rejected.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This build site will really destroy the area where I live.

Full name: Francesca Johnson

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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

or paragraph. Please be as precise as possible.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all

house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one.

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

I do not believe that it is possible to provide adequate modifications to make Sidmouth-31 a viable development. The only acceptable solution is to reject this site and focus on more suitable sites elsewhere. For just 15 houses - it makes much more sense to leave this field as National Landscape and build elsewhere. Otherwise once these 15 get built you'll then set a precedent to build some more next door and so on until the countryside is lost forever. Countryside which brings thousands of visitors to Sidmouth every year.

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

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

It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I feel very strongly about the need to block this development and believe that I need to be at all hearing sessions to be fully knowledgeable about future developments and to feedback my concerns. There is mention of a protest group specific to Sidmouth-31 for which legal representation is being investigated - which I intend to join adding another reason to request participation.

Peter Johnson

Full name: Peter Johnson

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

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

1. I live in Millend directly opposite the proposed building site. Access to the site would bring all construction traffic through whimple a village with NO Footpaths.

2. No footpaths exist from the proposed site to the school or Whimple facilities.

3. The site is accessed from a single track lane, two vehicles can't pass each other as witnessed by the recent accident of the local Sidmouth bus trying to pass a stationary lorry, showering its current customers in glass shards.

4. Yes it has been noted that field floods, no one has noted that the single track lane also floods, current drainage is insufficient in the lane, more houses and tarmac won't help cure this

5. Site wh_04 already has access and footpaths into Bramley gardens and is the right side of the village to stop any construction traffic increasing the likelihood of pedestrian injury.

Kerry Johnstone

Full name: Kerry Johnstone

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I don't feel qualified to judge whether the draft local plan for Feniton has been developed appropriately from a legal point of view. However, I understand that views expressed to date have not been taken into consideration, despite emails, comments and a petition signed by many residents (over 500!). The Strategic Planning Committee has not been presented with the views of the residents of Feniton, and this seems wrong. Requiring comments to be made through a system that is extremely hard to navigate by a member of the general public is tantamount to discrimination and hardly embraces democratic principles.

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

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

Flooding and sewage

Feniton already struggles with flooding and is undergoing a Flood Alleviation Scheme that at best will help protect existing homes from further flooding. Unfortunately, the current plan increases the flooding risk at the main access route to the village. So even the current scheme does not adequately tackle the problem of flooding, and it is unclear how effective it will be in addressing flood risk for existing homes.

Further development, without an appropriate Flood Alleviation Scheme in place, will undermine existing efforts, put existing and new homes at increased risk of flooding, as well as further increase the likelihood of more flooding at Pattersons Cross. Further

development without increasing the capacity of Feniton’s sewerage system will also cause more instances of raw sewage flooding along roads and homes in Feniton.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability

I am struck by the scale of the planned developments, which seem to be out of all proportion to the current size of Feniton. It is not clear to me why the proposals don’t fit with the local plan’s stated vision and strategy. If nothing has changed since the 2014 Super Enquiry that concluded Feniton was not a sustainable location for further development, why is Feniton now considered suitable for substantial further development?

As mentioned above, the Flood Alleviation Scheme has not been designed to cope with many extra homes, and already increases the risk of flooding at the main entry to the village. The FAS therefore does not constitute a significant positive change that would justify overturning the recommendations of the 2014 Enquiry.

Furthermore, Feniton’s roads will not be able to cope with a significant expansion to the number of houses in the village. The increased traffic experienced when the Ottery Road and Green Lane junction was closed recently led to significant traffic problems, including cars diverting through Old Feniton along single country lanes, causing congestion and on at least one occasion, preventing a school bus from getting children to secondary school. The increased flooding risk at Patterson’s Cross will also lead to diversions through Old Feniton. These roads simply can’t cope with a rise in traffic and will have a significant negative impact on home owners and car users in and around Feniton.

There are also issues with lack of capacity at Feniton Primary School and lack of GP Services. Several of my neighbours were unable to enrol their children into Feniton Primary School despite being a 10 minute walk away.

It is not clear to me on what grounds a substantial expansion of Feniton has been judged as sustainable.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need

The number of new houses proposed far exceeds local need. Devon Communities Together identified the need for 13 new homes up to 2027. This assessment was funded by EDDC. I understand that the Chairman of the Strategic Planning Committee re-wrote the Strategic Policy SP01 in the Regulation 19 version, in order to justify substantially increased development of Feniton well beyond local need. This has led to a significant mismatch between Vision and Strategy. Proposed development in Feniton is not 'limited' – it is excessive for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20

The plan to have an Employment site and an entrance to the site just off Green Lane is hugely problematic. Green lane is a favourite for pedestrians and dog walkers, is mostly a single track road, with a substantial parts of it not wide enough for a car to pass a walker comfortably. It is unlit, has pinch points, blind bends, and no pavements. It also has an ancient sunken portion subject to rock falls, blocking the lane. It seems highly inappropriate to construct an Employment site at the current planned location with an entry/exit onto Green Lane. I feel that the EDDC need to review the evidence more carefully to make a more informed decision. Furthermore, the proposed size of Otry_20 is inconsistent with EDDC's Spatial Strategy and is once again disproportionate to the scale of Tier 4 Feniton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spacial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I strongly feel that the Tier 4 status of Feniton should be properly reflected in the proposals, so that the Strategy and Vision can be re-aligned. This would mean imply removing Feni_08 and Otry_20 from the draft local plan.

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

Dave Jones

Full name: Dave Jones

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(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.: Another fake consultation exercise. EDDC have ignored residents every step of the way, forcing unwanted development and the destruction of green space.

EDDC is negligently causing local services to be overrun by allowing more and more development without demanding the right infrastructure.

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.: Investigate those responsible.

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

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

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Lots of co-operation with developers but not with local residents .

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

Jonathan Jones

Full name: Jonathan Jones

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Carolyn Jones

Full name: Carolyn Jones

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Philip Jones

Full name: Philip Jones

Proposal:

5. Development in the Towns and Villages

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

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

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

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

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA.

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

Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

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

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

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

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

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

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

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

Full name: philip jones

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site for Exmo 20 for housing allocation should be selected one which is deemed available, achievable & suitable in the HELAA. EXMO 20 would cause harm to the adjacent Pebblebed Heaths (SSI/SAC/SPA/NNR). Developing Exmo 20 is contrary to Policy PB01 of the local plan, and not in accord with the mitigation strategy. Exmo 20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2..

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

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

Full name: Dave Jones

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1, SD10 and SD11 development from the Local Plan. South West Water demonstrably cannot be trusted to address the issues and even if they try, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, and add to sewage pollution of local rivers, sea and streams.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The sewage situation is so out of control it's actively harming local people and the natural environment. Allowing more development before this is fixed is completely unacceptable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy does not take into account the already acknowledged failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: EDDC has completely failed to act upon feedback given by local people and parish councils.

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

Mary-Jane Jones

Full name: Mary-Jane Jones

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development at Exmo_20 should be located elsewhere to cause no harm to the Pebblebed Heaths. It would destroy the 'tranquility, wildness and dark skies' of the countryside. It would isolate habitats, destroy wildlife corridors, and cause detriment to irreplaceable habitats, veteran trees and species rich hedgerows across the site. Air quality in the area may be at risk, particularly due to the increase in car travel and traffic congestion resulting from such an increase in population from the proposed development. Exmo_20 is on the main rainwater catchment area of Withycombe Brook and could increase the flood risk at the lower end of the site and through Withycombe. Paragraph 11.2: It is isolated; people would need to travel nearly 1km to existing key services and facilities. It is too far and steep from the town centre for people to walk or cycle - they will use cars. The main access point to Exmo_20 is closer to Budleigh Salterton than Exmouth so that Budleigh would be the obvious choice for residents for goods, services, infrastructure and leisure. (Don't think the residents of Budleigh will be very pleased).

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

Full name: Dave Jones

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

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

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

Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1, SD10 and SD11 development from the Local Plan. South West Water demonstrably cannot be trusted to address the issues and even if they try, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, and add to sewage pollution of local rivers, sea and streams.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The sewage situation is so out of control it's actively harming local people and the natural environment. Allowing more development before this is fixed is completely unacceptable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy does not take into account the already acknowledged failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: EDDC has completely failed to act upon feedback given by local people and parish councils.

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

Full name: Dave Jones

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

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

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

Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1, SD10 and SD11 development from the Local Plan. South West Water demonstrably cannot be trusted to address the issues and even if they try, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, and add to sewage pollution of local rivers, sea and streams.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The sewage situation is so out of control it's actively harming local people and the natural environment. Allowing more development before this is fixed is completely unacceptable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy does not take into account the already acknowledged failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: EDDC has completely failed to act upon feedback given by local people and parish councils.

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

Tim Jones

Full name: Tim Jones

Other party name (if relevant): Hindcott

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to object to the allocation of Whim_08a in the EDDC Emerging Local Plan. This proposal is unsound due to safety concerns, environmental risks, and a failure of proper consultation and evidence.

The site lacks safe and convenient pedestrian access to key services in Whimble. There are no pavements on Church Road, and it is unsuitable for walking to the shop, school or station—especially for children and families. This makes the allocation contrary to policies encouraging sustainable and safe transport. The land is also part of a Green Wedge, designated to prevent coalescence between Cranbrook and Whimble. Development here would contribute to settlement merging and undermine the character of the village. This breaches the principles of Policy OL05 and has long-term implications for landscape and community identity.

Additionally, there are unconfirmed wildlife habitats on this land, including owls, bats, birds of prey, badgers and deer. These issues have not been fully assessed, nor has the site's flood risk, which officers previously said required more work. The lack of updated assessments makes the plan unsound, as it is not supported by proportionate evidence.

Importantly, at a public consultation event in Whimble, officers stated that this site was not under consideration. For it to appear later in the plan, without proper communication or justification, undermines the integrity and transparency of the consultation process.

It is on this basis, I strongly object to the plan to allocate land next to Bramley Gardens for development (Whim_08a)

Gareth Jones

Full name: Gareth Jones

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Procedural Errors: I believe that due process was not followed by the EDDC Strategic Planning authority by failing to follow proper procedures when they re-assessed the sites for Whimble at the EDDC Strategic Planning Committee on 1 November 2024.

Substantive Errors: I believe that the assessment of the planning proposal has failed to correctly consider the guidance provided by the planning officers' that the majority of sites including Whim_08 were unsuitable due to:

- Scale of development incompatible with spatial strategy.
- Site lacks safe and convenient pedestrian access to services and facilities in the village.
- The site forms part of the 'Green Wedge' between Whimble and Cranbrook.
- Forms an important part of the very attractive rural landscape setting for the settlement.
- Potential impact on wildlife
- Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation.

No additional assessments were carried out to support the allocation, raising serious concerns about the decision.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I do not believe that the process to arrive at the required number of houses for Whimble as outlined in Strategic Policy SD29: Development allocations at Whimble is a sound and just recommendation.

The objection is on the grounds of soundness in that the allocation in the policy is not based on solid evidence. The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024. Planning officers identified and assessed the potential sites in Whimble and using their professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not. In the case of Whim_08 site, officers recommended that the site was not allocated for the following reasons: · Scale of development incompatible with spatial strategy. · Site lacks safe and convenient pedestrian access to services and facilities in the village. · The site forms part of the ‘Green Wedge’ between Whimble and Cranbrook. · Forms an important part of the very attractive rural landscape setting for the settlement. · Potential impact on unconfirmed wildlife site. · Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to an allocation.

Members of the committee voted to go with the recommendation and not allocate the site. However, at the Strategic Planning Committee meeting on 1 November 2024 Members allocated part of the site, contrary to Officer recommendation without justification or additional work appearing to have been completed by officers to assess the risks relating to this site before allocating it.

Scale of development incompatible with spatial strategy. Policy SP01: Spatial Strategy section E states ‘Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.’ The EDDC Site Allocation Report for Whimble states ‘Whimble is a ‘Tier 4’ settlement, where the draft local plan seeks to promote limited development to meet local needs. The development of up to 83 dwellings for Whimble is excessive in

relation to the scale of the existing village and is not at the density of existing housing in the settlement boundary.

The allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01: Housing to address needs, which states ‘This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.’ There are developments planned in neighbouring areas e.g. Cranbrook. This includes the current Cobdens Expansion of Cranbrook, part of which is still in the Whimble Parish Area, where 1500 houses, a school and a travellers site have already been approved by the Strategic Planning Committee. These sites have a far better infrastructure than Whimble Village so why is the additional housing requirement not allocated at these sites?

The site forms part of the ‘Green Wedge’ between Whimble and Cranbrook. The EDDC Emerging Local Plan Policy OL05: Green Wedges states ‘Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.’ The Allocation of this site would potentially damage the individual character or identity of Whimble. This site forms an important part of the rural landscape setting for the settlement. This would also lead to settlement coalescence between Whimble and Cranbrook, which is a material planning issue, and clearly demonstrates that this site should not be allocated in the Local Plan. This was the view of the EDDC Planning Officers. Potential impact on unconfirmed wildlife site. Residents of Whimble have stated that this site is a wildlife site which is home to bats, owls, woodpeckers, deer and badgers. Any development of this site would be contrary to EDDC Emerging Local Plan Policy PB03: protection of irreplaceable habitats and important features. Part of it is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation. There is no evidence to suggest that officers have carried out further work relating to the flood risk before consideration was given to a partial allocation.

Summary Whimble Parish Council believes that Policy SD29: Strategic Allocations for Whimble, specifically site Whim_08a is not sound, as the decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made to partially allocate the site. Therefore, Whimble Parish Council and local residents want to see the modification of site Whim_08a being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district, where there is appropriate infrastructure.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduction of the allocation for Whimble to 33 houses at (Whim_11).

Peter Julian

Full name: Peter Julian

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

1. Do not access the site via the B3179

2. Revert to Exmo_20b as previously proposed

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

Louise kane

Full name: Louise kane

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This development is much closer to budleigh salterton than Exmouth, and would significantly increase the population of a small town. Budleigh has limited facilities: schools, doctors, parking, not to mention a huge overloading of an antiquated sewage system, which is resulting in pollution to the local area. The coalescence of budleigh and Exmouth is contrary to POLICY OL05 of the local plan.

EXMO 20 would cause harm to the adjacent Pebblebed Heaths (SSSi/SAC/NNR). EXMO 20 is contrary to POLICY PB01 of the local plan, and not in accordance with the mitigation strategy.

EXMO20 would cause harm to St John in the Wilderness Grade II listed church and churchyard, drastically altering the current rural setting for worship and burials. This is contrary to policy HEO2.

EXMO 20 would have a detrimental effect on the adjacent designated wildlife sites and would destroy the “ tranquility, wildness and dark skies” which is contrary to policy OL01.

EXMO20 would be in conflict with strategic nature area 368, and this is contrary to para 13.23 of the local plan and para 13.9.

EXMO 20 is in conflict with Policy OL09 and PB04, as the habitats regulations assessments states there is not sufficient certainty to rule out adverse effects in integrity in relation to air quality in east Devon

Further development on heavy clay soil, with ineffective soakaways, would exacerbate the already identified downstream flooding risk along Withycombe Brook. Any water would also likely run towards Budleigh Salterton and the already unstable cliffs which are constantly falling.

The location of EXMO 20 is not within walking distance of either Budleigh or Exmouth and both towns would need to be visited by cars. Neither towns are accessible on foot; the roads are fast B roads with new pavements, and not particularly suitable for cyclists. There is currently not enough parking in Budleigh for the current population, and this is exacerbated during the summer months when visitors come to the beach. Locals without parking spaces on their properties are often unable to park during the summer months due to visitors parking on residential streets all around Budleigh. The LORP has also attracted visitors from around the area and further afield, which has resulted in even more cars in the area. The EXMO20 access point is directly into the B3179 which is the main route into Budleigh. This is a fast road, and would also impact Ting Tong, Woodbury Common and Woodbury. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO 20 from The local plan. This site is not suitable, the local area cannot cope with an increase in population, we do not have the amenities or facilities to cope with this increase. Perhaps consider a much smaller development in the area with affordable housing for local people.

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

Robert Keast

Full name: Robert Keast

Proposal:

5. Development in the Towns and Villages

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

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: the infrastructure, in Exmouth is already overloaded, almost everything from Doctors and Dentists to sewerage and roads is at breaking point, the proposed number of additional dwellings will lead to overloading of sewers, roads and services. These need to be upgraded/updated to accommodate existing residents, and not grab the money from developers and run.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: see comments 3(b)

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

Susan and Charles Keate

Full name: Susan and Charles Keate

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Linda Keefe

Full name: Linda Keefe

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Matthew John Keen

Full name: Matthew John Keen

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

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

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

In relation to Feniton and the draft local plan, I argue that the general public's lack of detailed planning knowledge may result in an imbalance between public participation and the planners' expertise, potentially leading to decisions that are not fully representative of the community's interests. My point are.

1. Access to Information: A key argument is that the public may not have had adequate access to the necessary information or resources to understand the complex aspects of the draft local plan. This lack of transparency could lead to a situation where the planners, who are familiar with technical planning details, have an unfair advantage in shaping the final plan.

2. Engagement and Consultation: The consultation process may not have been designed in a way that actively encouraged or facilitated meaningful participation from the general public. This could be seen as an issue if the planners relied on public

feedback that was not fully informed or representative due to barriers such as limited time for consultation, jargon-heavy documents, or insufficient outreach to underrepresented groups.

3. Complexity of the Plan: Planners often use technical language and complex planning terms that may be inaccessible to the general public. This complexity could be seen to skew the process in favor of the planners and limit the public's ability to provide informed, constructive feedback.

4. Bias Toward Planners' Expertise: There could be a perception of bias where the planners, due to their expertise and experience, may disproportionately influence the plan in ways that do not fully account for the preferences or needs of the local community, especially if the public's input is not adequately considered or if the planners dismiss concerns that could be seen as less "technical."

5. Legal Compliance and Fairness: If the consultation process or the way the local plan has been developed is not legally compliant (e.g., failure to meet statutory requirements for public consultation or accessibility), it could be argued that the process has not been fair, which may undermine the legitimacy of the plan.

I argue that the lack of consideration for the emails, comments, and petition from over 500 residents could indicate bias in favor of developers, and not adequately consider the views of Feniton residents.

"I believe that the consultation process for the Feniton development has been flawed in that substantial public input—specifically emails, comments, and a petition signed by over 500 local residents—was not given due consideration simply because it was not submitted through the Common Place platform. This restriction may have unduly limited the scope of public engagement and resulted in the voices of the community being sidelined in favor of developers' interests.

The fact that these responses were dismissed due to the format of submission could be argued to demonstrate a systemic bias that favors the developers' position, as opposed to a fair and transparent process that genuinely takes into account the concerns and views of local residents. Public consultation is a critical component of the planning process and must be inclusive, accessible, and responsive to all forms of input, not just those submitted via specific channels that may not be accessible or widely known to all residents. By disregarding legitimate forms of input from a large group of residents, the process risks undermining the principles of fairness, equality, and genuine community involvement in the planning process."

Additional Points

1. Inclusivity of Consultation: A truly inclusive consultation process should allow all forms of feedback, particularly in a community as engaged as Feniton. The failure to consider the petition and individual emails could be perceived as a procedural oversight that disproportionately disadvantages the community.

2. Bias Toward Developers: The rigid reliance on the Common Place platform, which may not have been widely promoted or accessible to all residents, could create an unintentional bias towards the developers' interests. Developers and planners are typically aware of and comfortable with formal submission processes, while local residents may not be as familiar with these platforms.

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

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

Feniton is a community that is all too familiar with regular flooding, a problem that has been well-documented over time. Yet, it appears that East Devon District Council (EDDC) has overlooked the historical evidence of flooding, including instances of raw sewage being released into the environment.

The reality is that further development will only exacerbate the flooding situation. Promises made by previous developers to alleviate flood risks have, to date, not been fulfilled, leaving residents vulnerable.

The Flood Alleviation Scheme (FAS) was designed to accommodate only the current number of homes in Feniton, and its limited scope means it merely diverts floodwaters to the eastern side of the village. This shift will result in increased flooding at Pattersons Cross, the main access route to the village from the A30, which already becomes impassable during heavy rainfall—without the added burden of redirected floodwater.

Despite millions of pounds of public money having been spent on the scheme, there is no tangible evidence to show that the FAS is effective in reducing flood risk, leaving Feniton's residents facing ongoing, unresolved flood threats. The situation demands urgent reassessment, as the current approach is insufficient to protect the community and prevent future disasters.

It is an undeniable fact that our sewerage system is operating beyond its capacity, leading to stormwater overflows that enter the drainage system, intensifying the risk of sewage flooding. This critical issue is not only unresolved but continues to threaten the health and safety of our community.

The evidence is clear and well-documented: roads and homes regularly flood with raw sewage, creating hazardous conditions and significant distress for residents. The severity of this problem is highlighted in Chapter 2 The Vision, Objective 1, and Chapter 7 Flood Risk Strategic Policy AR01 – C, which emphasize the urgent need for action.

This ongoing failure to address the underlying issues of the sewerage system exposes our community to unacceptable risks, and it is imperative that this is rectified before further development compounds an already critical situation.

At the 2014 Super Inquiry, the Planning Inspector, with the full agreement of East Devon District Council (EDDC), determined that Feniton was not a sustainable location for further development. Nothing has changed since that determination—aside from the untested Flood Alleviation Scheme (FAS)—to address the significant issues highlighted during that inquiry.

Feniton remains critically underserved in several key areas:

Public transport is woefully inadequate, offering limited options for residents.

All roads into Feniton are narrow, with dangerous pinch points, poor lighting, and are ill-suited to handle heavy traffic.

The recent closure of the Ottery Road/Green Lane junction for FAS works provided a stark reminder of how vulnerable the village is to traffic congestion. Delays in and out of the village were extensive, showing how even temporary disruptions can severely impact daily life.

When Pattersons Cross floods—as is expected with increased rainfall due to the FAS—all traffic will be forced to reroute through Feniton Old Village or via a series of narrow lanes connecting to the A373 and M5. These routes are unsuitable and unsafe for heavy traffic, posing a serious risk to public safety.

Feniton Primary School is already at capacity and urgently needs expansion, yet there are no plans to address this growing demand.

Local GP services are also at capacity, struggling to meet the needs of the community.

Despite all of this, there has been a clear disregard for the planning history and evidence that show this scale of development in Feniton is unsustainable.

The proposals for Feniton directly contradict the vision and strategy outlined in the local plan, and by extension, they are at odds with national policy. Continuing to push for development in Feniton, given the current infrastructure and services, is not just impractical—it is irresponsible. The issues raised in the 2014 inquiry remain unresolved, and any further development would exacerbate these problems, rather than solve them.

Funded by East Devon District Council (EDDC), Devon Communities Together (DCT) conducted a survey that identified a clear local need for only 13 dwellings in Feniton by 2027. Yet, the number of houses planned for Feniton in the draft local plan is shockingly disproportionate to this identified need and fails to reflect the findings of the DCT survey, which was itself funded by EDDC.

When the Strategic Planning Committee realized that the number of houses allocated for Feniton far exceeded the local demand, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, altering the plan to justify the inflated development proposal. This revision has created a serious mismatch between the stated vision and the actual strategy, leaving the local community vulnerable to unchecked overdevelopment that does not align with their needs.

The proposed development for Feniton is no longer ‘limited’—it is massive for a Tier 4 village, and it threatens to undermine the character and sustainability of the settlement.

The scale of this proposal contradicts the principles outlined in Chapter 3 (3.4 Hierarchy of Settlements) and Chapter 5 (Strategic Policy SD18), which emphasize the need for balanced, context-sensitive growth. Furthermore, Strategic Policy SP01 (C, D, E) underscores the need for a strategic approach that prioritizes local needs and sustainable development, principles that are clearly being disregarded.

This proposal is not just misguided; it is an imposition on Feniton's future, one that risks harming the very essence of the community. The voices of local residents and the evidence from the DCT survey must not be ignored. Feniton deserves a plan that respects its scale, infrastructure, and genuine needs, not one that prioritizes growth for growth's sake.

Site Otry_20 is located in an area that poses significant safety concerns. The only access point to the site is off Green Lane, a narrow, single-track road that is often not wide enough for cars to pass pedestrians without the pedestrian having to step into the hedge. It is unlit, has dangerous pinch points, blind bends, and a complete lack of pavements, making it extremely hazardous for pedestrians, cyclists, and drivers alike. There are also two single-track, over-the-railway-line bridges, one of which is situated at a blind bend. Furthermore, a section of the lane is an ancient sunken portion, which is susceptible to rock falls, frequently blocking the road.

The dangers of Green Lane are starkly illustrated in a video available on YouTube, which details many of these issues. The blind bends at either end of this lane are especially treacherous, and they pose a real risk to anyone attempting to navigate this route, whether on foot or by vehicle.

Similarly, Feni_08, which is also proposed for development, is accessed via Broad Lane, which shares many of the same hazards as Green Lane, including narrowness, lack of lighting, and dangerous bends. This further compounds the concerns over the safety of the proposed developments.

It is concerning that Otry_20 was brought forward for consideration after the Regulation 18 draft consultation, leaving EDDC with insufficient time to properly review all the

relevant evidence and consider the full scope of the safety risks. As a result, this site has not been adequately scrutinized, and the community's concerns have not been fully addressed.

Additionally, the proposed size of Otry_20 is entirely out of step with EDDC's Spatial Strategy and is grossly disproportionate to the scale of Feniton as a Tier 4 settlement. This overdevelopment would place an immense strain on local infrastructure, safety, and the environment. The allocation for industrial, warehousing, and distribution uses on Otry_20 is also disproportionate compared to similar employment sites in Tier 1 (Exmouth), Tier 2 (Axminster), and Tier 3 (Ottery St Mary and Seaton), further highlighting the mismatch between the development and the intended role of Feniton as a small rural village.

The development of Otry_20 contradicts several key objectives laid out in the Spatial Strategy—particularly those outlined in Chapter 2 (The Vision), Chapter 3 (The Spatial Strategy), and Strategic Policy SP01 (C, D, E). These documents emphasize the importance of sustainable, context-sensitive growth that aligns with the needs and capacities of each settlement. Otry_20, in its proposed scale, flies in the face of these guiding principles and would undermine the integrity of Feniton as a small, rural community.

The proposed development at Otry_20 is unsafe, unsustainable, and misaligned with the broader objectives of the local plan. The risks to safety, infrastructure, and the community's wellbeing are too significant to overlook, and this proposal must be reconsidered with the utmost care.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: For the sake of our community's future, and to preserve the very heart of Feniton, we must call for a plan that reflects the reality of our village's needs and limitations. Feniton is a small, Tier 4 settlement—an area that simply cannot bear the weight of excessive development without losing its essence. We urge the decision-makers to take a step back, realign the

strategy and vision, and ensure that growth is sustainable and in harmony with our community's true needs.

We ask for the removal of Feni_08 from the draft local plan, or at the very least, a drastic reduction in the number of houses allocated for Feni_08. Our village has already stretched its resources to the limit, and further overcrowding will only lead to a loss of what makes Feniton so special. Our schools are at capacity, our roads are already struggling, and our infrastructure cannot keep up. This is not just about numbers—this is about preserving the spirit of Feniton, the place we call home.

We also ask for the removal of Otry_20 from the draft local plan entirely. The proposed development threatens to overwhelm our narrow lanes, flood-prone areas, and already fragile community services. It's too much, too fast, and it will irreversibly change the landscape we hold dear. The heart of Feniton beats in its quiet, close-knit nature, and we fear that if these plans go ahead, we will lose that forever.

Please, listen to the voices of those who have lived here, loved here, and built their lives here. We deserve a plan that respects Feniton's character, its capacity, and its future. The time to act is now, before it's too late.

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

Graham Keen

Full name: Graham Keen

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.:

This issue is far more important than a simple form filling exercise. The absurd proposal suggested by EDDC is an ill conceived solution to a problem created entirely by EDDC's predecessors. For more than two decades EDDC refused to acknowledge that the unfinished 1995 scheme was causing any problems to the East Beach. The original sea defences scheme to protect Sidmouth's shoreline was halted early before it was completed. A third rock island was proposed to protect the beach to the East of the River Sid. Under EDDC's watch the third rock island which was proposed to protect the beach to the East of the River Sid was scrapped; the ensuing catastrophic beach & cliff erosion has been exponentially accelerated as a result. A simple example can be seen from old postcards & photographs of Sidmouth's seafront. Unprecedented levels of procrastination by subsequent Councils on a monumental scale have been the root cause of what has been a catalogue of man-made problems. eg removing the cliff drainage system from Alma Field on Salcombe Hill; removing the old wooden breakwaters – a vital element of any coastal management system that minimises erosion. EDDC has a responsibility to fix the problem it has created rather than ignore the issue and impose ludicrous restrictions, under the proposed CCMA, to local homeowners' freedoms to enjoy an unfettered quality of life just as all other local inhabitants are able to do.

Andy Kennedy

Full name: Andy Kennedy

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Douglas Kenny

Full name: Douglas Kenny

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient accessible town. The services and infrastructure of Budleigh (shops, Doctor's, school, beach ect) would be the preferred choice for residents of Exmo 20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

Exmo 20 would increase the need for car travel and and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable devepopment as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

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

1. Do not access Exmo 20 area from the B3179.
2. Access to the site should be off of Dinan Way which would give safer and a more direct to the A376 Exeter Road.

3. Reduce the size of Exmo 20

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

Julie Kent

Full name: Julie Kent

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There seems to have been little consultation with the residents of Sidford relating to the inclusion of this site for housing. The policy on National Landscape says that the boundaries are set by the Secretary of State and cannot be changed through the Local Plan process(12.7).

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of this site for housing is inconsistent with the policies set out in the draft plan. Those policies relating to National Landscape, Areas of Strategic Visual Importance and Flood risk management.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There seems to have been little consideration of Transport and Infrastructure aspects relating to this site. Access unsuitable from Windsor Mead as the acquisition and destruction of two private gardens would be necessary. Access

via Burscombe Lane is also unsuitable due to the narrow width of the lane. Both exit onto the busy A3052 at poorly constructed junctions. Assessment of Infrastructure has not been carried out - footpath and pedestrian access is inadequate, sewage and flood risk has not been taken into account. Environmental degradation would occur through the destruction of a section of Devon hedge, excavation on site, lighting and pollution of the dark skies. Visual impacts would be negative as views from Trow Hill, Salcombe Hill of housing on this site would be affected. The protection of the landscape and biodiversity within the Sid Valley would be adversely impacted by development on this site which is on rising land within the National Landscape.

Anne Killoran

Full name: Anne Killoran

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. We know from experience that they seem to run out of money before the 'affordable' homes are built as on Goodmores Farm so the town is deprived of much needed social housing. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

This location would have only one access and exit road (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

EDDC are. It considering the pressure this new estate would have on our infrastructure You know that the Sewage system is broken and SWW are not addressing the problems we have at the moment and are not talking about building any new facilities to cope with any new housing estates All this sewage will pumped out to Sea Not a great way to promote our beautiful coastline I believe EDDC have a duty to safeguard our landscape and this new proposal is not only going to devastate an area of natural beauty but also put untold pressure on our Doctors, Dentists and all the other services we need

Elaine King

Full name: Elaine King

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development . Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac. Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders. Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned. Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We

already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed. Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point. Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes. View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods. Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I do not believe that it is possible to provide adequate modifications to make Sidmouth-31 a viable development. The only acceptable solution is to reject this site and focus on more suitable sites elsewhere. For just 15 houses - it makes much more sense to leave this field as National Landscape and build elsewhere. Otherwise once these 15 get built you'll then set a precedent to build some more next door and so on until the countryside is lost forever. Countryside which brings thousands of visitors to Sidmouth every year. We are meant to be protecting the local wildlife & countryside not destroying the delicate ecosystem that we currently enjoy.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I feel very strongly about the need to block this development and believe that I need to be at all hearing sessions to be fully knowledgeable about future developments and to feedback my concerns. There is mention of a protest group specific to Sidmouth-31 for which legal representation is being investigated - which I intend to join adding another reason to request participation.

Charles King

Full name: Charles King

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development . Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac. Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders. Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned. Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We

already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed. Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point. Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes. View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods. Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead.

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

Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development . Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to

mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac. Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders. Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned. Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been take to prevent this - extra building should not be allowed. Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point. Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes. View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods. Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid

rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead.

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

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity).

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

Graham Kingham

Full name: Graham Kingham

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Damage to pebble-bed heaths and wild life. By developing Exmo 20 is contrary to policy PB01 of the local plan and not in accordance with the mitigation policy. This plan makes a mockery of having a local structural plan every ten years if it is being over ridden.

Exmo 20 would destroy the wild life habitat and dark sky's contrary to policy OL01 This will also fragment and isolate habitats and alter wildlife corridors, having been reinstated to shrub land recently. Paragraph 13.23 Local plan. There is a conflict between policy OL09 and PB04 regarding air quality. St John's church is a grade II listed church and church yard a restful peaceful place that means a lot to the worshipers.

Exmo 20 will alter this environment contrary to Policy HEO. The water catchment area north of Exmouth is heavy clay, making soakaways ineffective and as a result of building, flooding around Withycombe Policy ARO1B This area is not served by any major roads or transport hubs making car travel a major source of transport. In conflict with paragraph 11.6 and 11.2 As this is nearer Budleigh Salterton the infrastructure of the town is not suitable, small high street, very limited parking. No room for expanding either doctors or dentists. Daily sewage spills into the sea, a claim is being presented to SWWater. Schools are limited and in need of repair. there is a danger of the two towns merging. Contrary to Policy OL05 of the local plan.

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

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

Remove Exmo 20 from this area. Continue with the new town on the east of Exeter as per the local plan. FULL TOWN development will provide parking, schools doctors, dentists and so on.

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

Ellie Kinnear

Full name: Ellie Kinnear

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development at Exmo20 should be located on an alternative site the current location will cause harm to the much treasured and protected Pebblebed Heaths (SAC/SPA) The Exmo 20 development proposal is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy Developing EXMO20 would be detrimental to wildlife habitats would be isolated and corridors destroyed This is contrary to Paragraph 13.23 of the Local Plan The habitats would be irreplaceable species rich hedgerows and veteran trees destroyed contrary to Paragraph 13.9 of the local plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Ideally remove Exmo 20 from the local plan failing this revert to the previous proposals for Exmo 20 do not access site via B3179 or via Southern wood

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: This is such an important issue and I feel as many people as possible should take an active part in listening to the decision making and suggestions so huge mistakes are not made and we do not destroy our countryside unnecessarily

Tom Kinnersley

Full name: Tom Kinnersley

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo 20 is in conflict with OL05. From its access point the centre of Budleigh Salterton is half the distance to Exmouth and it is inevitable that the facilities there will be used in preference to Exmouth. A development of this size would both lead to and encourage coalescence.

Full name: Tom Kinnersley

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo 20 is in conflict with paragraph 11.2 of the local plan. It is so isolated that car use would be essential thus increasing traffic. It is also contrary to 11.6 because it is nowhere near services and facilities. Walking and cycling could not possibly be the choice of transport - contrary to Policy TR 01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo 20, do not access the site from the B3179 and find a way to reduce the distance to Exmouth town centre.

Full name: Tom Kinnersley

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo 20 is in conflict with policy SP01. Exmo 20 is completely detached from Exmouth and cannot be considered to be a development of a tier 1 town

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

Jane Kinnersleyq

Full name: Jane Kinnersleyq

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh Salterton its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh Salterton and Exmouth, contrary to OL05.

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

Full name: Jane Kinnersleyq

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Allocation of Exmo 20 is in conflict with policy SP01. Exmo 20 is completely detached from Exmouth and therefore cannot be considered to be a development in a Tier 1 town

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

Tom Klampfer

Full name: Tom Klampfer

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

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

Harry knee

Full name: Harry knee

Proposal:

5. Development in the Towns and Villages

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

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

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

- An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.
- Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HEO2. Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

- Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

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

Reduce the size of the site

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

Karen Knight

Full name: Karen Knight

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmouth_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Health (SAC/SPA).

Developing Exmouth_20 is contrary to POLICY PB01 of the local plan and is not in accordance with migration strategy. Ex,o_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exm0_20 from Local Plan

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

Liesbeth Kop

Full name: Liesbeth Kop

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.: WS10

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

Lack of Public Awareness: The proposal has not been adequately communicated to the residents of Topsham, who are the most affected by this development. Despite the significant impact on the Topsham area, there has been no distribution of leaflets, no social media advertising, and no other forms of public notification. This is evidenced by the fact that the chapter on 'local towns and villages' contains all the development in the East Devon Towns, whilst the development affecting Topsham Town, is hidden under the chapter 'West End chapter'. This is misleading, and ambiguous to most people. It is evident from the low response rate: ie. 56 comments as opposed to more than 1300 comments on the 'towns and villages' chapter. When the Apsham Grange development in Topsham came forward, more than 1500 people objected to it. This time only 56 comments have been received. That suggests inadequate consultation. Insufficient Consultation: Many residents in Topsham are unaware of the proposals. This lack of awareness is particularly concerning given that the Exeter Local Plan has recently undergone consultation. Residents may mistakenly believe their involvement in the consultation process is complete, without realising the specific implications for Topsham. Obliviousness to Proposals: The general obliviousness among Topsham residents regarding the development proposals indicates a failure in the communication strategy. Effective public consultation requires that all affected parties are informed and given the opportunity to voice their opinions. The local plan fails to meet legal compliance due to inadequate public awareness and consultation efforts.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I urge the planning authority to repeat the engagement of the proposals in and around Topsham to ensure proper communication and engagement with the residents of Topsham before proceeding with any development.

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.: As a resident of Topsham, I strongly object to the proposal to develop the land between the Blue Ball pub and Topsham for the following reasons:

1. Overloading Local Amenities and Services:

- Topsham Surgery: The surgery is already oversubscribed, as confirmed by the Devon NHS submission. There is no indication of how this issue will be addressed.
- Topsham Primary School: The school is at capacity due to increased demand from recent developments at Rydon Lane and Exeter Road. Ongoing developments in Newcourt Road and Clyst Road have further strained resources. The County Council has not provided any plans to mitigate this issue or address how parents and children from the new development will travel to and from school.

2. Increased Traffic Levels and Related Emissions:

- The proposed development is over 2km from Topsham train station, with no indication that bus routes will be diverted to serve the area. Current government advice discourages reliance on car use for new developments. However, it is clear that most residents will depend on cars for shopping, leisure, and commuting.
- Traffic Congestion: The roundabout at Clyst St Mary is already at or over capacity, and the Sandy Park junction is operating near full capacity. Without real mitigation measures, these areas will become oversaturated. Denver Road and Elm Grove Road are narrow with poor pedestrian and cycling facilities, and further development will exacerbate congestion.

3. Lack of Measures to Promote Sustainability:

- The proposed developments are too far from Topsham, the train station and facilities to meaningfully encourage people to cycle or walk to the local amenities. Therefore, the 600 proposed houses will increase traffic massively to the local network which is already heavily constrained

4. Negative Impact on Quality of Life for Local Residents and Wildlife:

- Recent developments on Clyst Road and Newcourt Road have irrevocably changed the character of this part of Devon, disregarding its semi-rural nature. The Taylor Wimpy development has ignored DCC guidance on streetlighting, adopting high-level streetlights and illuminated bollards that cause light pollution and disrupt wildlife.
- Devon Wildlife Trust has stated that the original wildlife assessment by the developer was insufficient. The developer's claim that dormice present at the site do not require special protection is contradicted by Devon Wildlife Trust, which suggests the proposal fails to meet national and local authority planning requirements for a 10% net gain in biodiversity. The latest NPPF guidance of 2025 emphasizes the importance of minimising impacts on biodiversity and providing net gains where possible.
- Buzzards, badgers, deer, green and great spotted woodpeckers live in this area and frequently seen, amongst a whole other host of wildlife, this development will be to their detriment as their habitats will be lost. For all these reasons, I urge you to reconsider this aspect local plan. Please do not put further strain on the wildlife and network in this area. The proposals have not been properly considered by the community.

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.: If development must come forward, at minimum, do not propose developments on the eastern side of Clyst Road. Consider converting the existing Clyst Lane into a cycle path and wildlife corridor, similar to the approach taken at Apsham Grange where Clyst Road has been closed to through traffic, and main traffic diverted through the new estate. This will at least minimise the impact,

and allow people with an attractive alternative option to sustainable travel to and from Exeter.

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

Full name: Liesbeth Kop

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.: WS15

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: I believe the local plan is not legally compliant for the following reasons:

Lack of Public Awareness:

The proposal has not been adequately communicated to the residents of Topsham, who are the most affected by this development. Despite the significant impact on the Topsham area, there has been no distribution of leaflets, no social media advertising, and no other forms of public notification.

Insufficient Consultation: Many residents in Topsham are unaware of the proposals. This lack of awareness is particularly concerning given that the Exeter Local Plan has recently undergone consultation. Residents may mistakenly believe their involvement in the consultation process is complete, without realising the specific implications for Topsham.

Obliviousness to Proposals: The general obliviousness among Topsham residents regarding the development proposals indicates a failure in the communication strategy. Effective public consultation requires that all affected parties are informed and given the opportunity to voice their opinions.

The local plan fails to meet legal compliance due to inadequate public awareness and consultation efforts.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I urge the planning authorities to ensure proper communication and engagement with the residents of Topsham before proceeding with any development.

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.: WS15
Objection to Darts Farm Development

I strongly oppose the proposed development at Darts Farm for the following reasons:

Inappropriate Urban Development in a Rural Setting: The proposed development is situated in a rural area that is rich in biodiversity and wildlife. This setting is not suitable for further urban expansion, which would disrupt the natural habitat and negatively impact the local ecosystem.

Existing Retail Developments: There are already substantial retail developments nearby in Sowton and Marsh Barton, Exeter. These existing facilities adequately serve the retail needs of the community, making additional development at Darts Farm unnecessary. Further development is possible in these areas, with appropriate vehicular access

Light Pollution: Light pollution is a significant issue in the area. The lights at the current retail centre dominate the landscape and are often left on 24/7. The proposed development would exacerbate this problem, further spoiling the sensitive environment and affecting local wildlife.

Traffic and Congestion: Darts Farm has recently expanded its car park, utilising green fields. Most visitors travel by car, contributing to increased traffic in Topsham. The Clyst St Mary roundabout and Sandy Gate car park area are already congested, and

additional development would worsen this situation. The proposed developments in Exton, Lymington, and Exmouth will also add to the traffic burden.

Alternative Locations for Employment: It would be more beneficial to locate further employment opportunities in Sowton, Marsh Barton, or preferably in the city centre. The city centre currently lacks diversity in retail ownership, with most shops and retail units owned by a single company. Introducing more businesses in the city centre would enhance its versatility and economic vitality.

The proposed development at Darts Farm is unnecessary and would have detrimental effects on the local environment, traffic, and community.

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 urge the planning authorities to reconsider this proposal and explore alternative locations that are more suitable for development (such as Exeter Sowton, Marsh Barton, or Exeter City Centre) Alternatively, Exmouth town Centre, or some of the other market and coastal town centres such as Honiton, Cranbrook could do with some investment in their town centres to make it more economically attractive for visitors to spend time in.

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

Paul Kurowski

Full name: Paul Kurowski

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point for Exmo_20 is much closer to Budleigh Salterton than it is to Exmouth, so Budleigh Salterton will be the most convenient and accessible town for the residents of Exmo_20. So the preferred choice of services and infrastructure (High Street shops, doctors, school, beach etc) for residents of Exmo_20 will be Budleigh Salterton. This undermines the settlement hierarchy and would mean that Budleigh Salterton and Exmouth would coalesce, contrary to POLICY OL05 of the Local Plan.

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

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church - where it would erode the existing attractive rural setting for worship and burials . This is contrary to POLICY HE02.

Exmo_20 will have a seriously detrimental effect on this open countryside site and the adjacent internationally designated wildlife site (the highest designations -

SSSI/SAC/SPA/NNR) and would eliminate the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

The development of Exmo_20 is in conflict with the Strategic Nature Area 368, and would fragment and isolate habitats, destroying wildlife corridors which is contrary to PARAGRAPH 13.23 of the Local Plan. This would cause harm to the irreplaceable habitats, veteran trees and species rich hedgerows which exist across the site, contrary to PARAGRAPH 13.9.

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

POLICY PB04 states that to help preserve the integrity of the East Devon Pebblebed Heaths on account of the potential impacts of predation of birds by domestic cats, direct recreational disturbance, dog related impacts and urban effect impacts, new dwellings and tourist accommodation or other developments that may result in unacceptable impacts will not be permitted on or within 400 meters of the Pebblebed Heaths - Exmo_20 is within 400m meters of the Pebblebed Heaths.

The development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth - this is already under pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and would increase traffic congestion, in conflict with PARAGRAPH 11.2. Its isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far, too steep, and too dangerous (no pavements on a winding narrow road) for potential residents to reach any town centre using walking or cycling as their choice of transport. This is contrary to POLICY TR01.

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

Remove Exmo_20 from the plan as it is far too big for the infrastructure in the area, and will have detrimental impact on the adjoining East Devon Pebblebed Heaths NNR.

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

Penny Kurowski

Full name: Penny Kurowski

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point for Exmo_20 is much closer to Budleigh Salterton than it is to Exmouth, so Budleigh will be the most convenient and accessible town for the residents of Exmo_20. So the preferred choice of services and infrastructure (High Street shops, doctors, school, beach etc) for residents of Exmo_20 will be Budleigh. This undermines the settlement hierarchy and would mean that Budleigh and Exmouth would coalesce, contrary to POLICY OL05 of the Local Plan.

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

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

Exmo_20 will have a seriously detrimental effect on this open countryside site and the adjacent internationally designated wildlife site (the highest designations -

SSSI/SAC/SPA/NNR) and would eliminate the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

The development of Exmo_20 is in conflict with the Strategic Nature Area 368, and would fragment and isolate habitats, destroying wildlife corridors which is contrary to PARAGRAPH 13.23 of the Local Plan. This would cause harm to the irreplaceable habitats, veteran trees and species rich hedgerows which exist across the site, contrary to PARAGRAPH 13.9.

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

POLICY PB04 states that to help preserve the integrity of the East Devon Pebblebed Heaths on account of the potential impacts of predation of birds by domestic cats, direct recreational disturbance, dog related impacts and urban effect impacts, new dwellings and tourist accommodation or other developments that may result in unacceptable impacts will not be permitted on or within 400 meters of the Pebblebed Heaths - Exmo_20 is within 400m meters of the Pebblebed Heaths.

The development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth - this is already under pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and would increase traffic congestion, in conflict with PARAGRAPH 11.2. Its isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far, too steep, and too dangerous (no pavements on a winding narrow road) for potential residents to reach any town centre using walking or cycling as their choice of transport. This is contrary to POLICY TR01.

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

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access any new development site such as Exmo_20 via the B3179

Remove Exmo_20 from the plan it is far too big for the infrastructure in the area, and will have detrimental impact on the adjoining East Devon Pebblebed Heaths NNR.

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

Full name: Paul Kurowski

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The proposed East Budleigh Site is outside of the Built-up Area Boundary in the Neighbourhood Plan (Made and Approved) contrary to SP03, SP05 and SP06. The proposed development needs to be only affordable housing but there are minimal employment opportunities, ie, a volunteer-run community shop, a volunteer-run pub, a church and a school so this is not a sustainable development contrary to SP01. The current infrastructure, ie, pedestrian, cycling and vehicular access, is inadequate in and around East Budleigh and this proposed development will exacerbate the problems close to the Lower Otter Nature Reserve contrary to SP07. East Budleigh and the River Otter estuary are within a National Landscape. The proposed site is adjacent to the Lower Otter Nature Reserve which is nationally important, is still developing and is designated a site of Special Scientific Interest (SSSI) - the site development will not enhance the NL and is contrary to OL02, PB01 and PB02 and will fail to meet PB05. The proposed development will impact the scenic quality of the district and the view to the iconic Syon House contrary to OL04.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed East Budleigh site (Ebud_01) is within the new settlement boundary shown in this proposed plan, hence meeting SP03, SP05 and SP06, however it is outside the Built-up Area Boundary in the Neighbourhood Plan for East Budleigh with Bickton (Made and Approved). The proposed site is on farmland and near Flood Risk 2/3 areas.

The proposed development (Ebud_01) needs to be only affordable housing but there are minimal employment opportunities, ie, a volunteer-run community shop, a volunteer-

run pub, a church and a school so this is not a sustainable development contrary to SP01.

The current infrastructure, ie, pedestrian, cycling and vehicular access, is inadequate in and around East Budleigh and this proposed development will exacerbate the problems as Frogmore Road is a very narrow road close to the Lower Otter Nature Reserve contrary to SP07. Access to the main village will require crossing the busy B3178.

East Budleigh and the River Otter estuary are within a National Landscape. The proposed site is adjacent to the Lower Otter Nature Reserve which is nationally important, is still developing and is designated a site of Special Scientific Interest (SSSI) - the site development will not enhance the NL and is contrary to OL02, PB01 and PB02 and will fail to meet PB05.

The proposed development will impact the scenic quality of the district and the view to the iconic Syon House contrary to OL04.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If the proposed site (Ebud_01) is developed it should be only affordable housing or small units suitable for first time buyers. A safe crossing method including pedestrian paths from the site to the main village must be provided.

An alternative location is proposed as per the attached diagram - this site, on the B3178 behind Collins Park, potentially would provide safer access onto the B3178. There is an existing footpath from the B3178 adjacent to this alternative location that gives safer access to Middletown Road and to the village facilities. This part of the B3178 is relatively flat and would provide better access to the B3178 than from Frogmore Road from the proposed East Budleigh site (Ebud_01).

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

Full name: Penny Kurowski

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed East Budleigh site is within the new settlement boundary shown in this proposed plan, hence meeting SP03, SP05 and SP06, however it is outside the Built-up Area Boundary in the Neighbourhood Plan for East Budleigh with Bicton (Made and Approved 2017).

The proposed development needs to be only affordable housing but there are minimal employment opportunities, ie, a volunteer-run community shop, a volunteer-run pub, a church and a school so this is not a sustainable development contrary to SP01. The current infrastructure, ie, pedestrian, cycling and vehicular access, is inadequate in and around East Budleigh and this proposed development will exacerbate the problems as Frogmore Road is a very narrow road close to the Lower Otter Nature Reserve contrary to SP07. Access to the main village will require crossing the busy B3178.

East Budleigh and the River Otter estuary are within a National Landscape. The proposed site is adjacent to the Lower Otter Nature Reserve which is nationally important, is still developing and is designated a site of Special Scientific Interest (SSSI) - the site development will not enhance the NL and is contrary to OL02, PB01 and PB02 and will fail to meet PB05. The proposed development will impact the scenic quality of the district and the view to the iconic Syon House contrary to OL04.

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

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SD16 from the Local Plan.

If this is not possible then it should be reduced in size.

Any development should consist only of affordable housing or small units suitable for first-time buyers.

A safe crossing a method, including paths for pedestrians, should be made from the site to the main village.

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

Stefan Laeger

Full name: Stefan Laeger

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There is a government requirement to consider the impact of new developments the environment and transport. Proposing 1400 new homes in Axminster without improving single lane Weycroft bridge (which is the ONLY access road to the town from the north) will lead to significant traffic and environmental impacts and congestion. This has not been appropriately considered meaning the plan is not legally compliant.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Either 1) make a firm commitment in the plan to put in place strategic mitigation measures/policies by committing to improvements to single lane Weycroft bridge (which is the ONLY access road to the town from the North) to enable these significant housing developments or 2) reduce the housing allocation for Axminster to a level which is more sustainable in terms of traffic impacts. This is likely to only be around 500.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Same reason as above, this section of the development plan is not sound as environmental/traffic impacts have not been adequately considered, identified nor strategically mitigated.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Either 1) make a firm commitment in the plan to put in place strategic mitigation measures/policies by committing to improvements to single lane Weycroft bridge (which is the ONLY access road to the town from the North) to enable these significant housing developments or 2) reduce the housing allocation for Axminster to a level which is more sustainable in terms of traffic impacts. This is likely to only be around 500.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: During the plan preparation the EDC spatial planning team has clearly not co-operated with the EDC highways team or the Department for transport . This has led to a situation where major transport/environmental impacts due to significant proposed Axminster housing developments clearly not been properly assessed or strategically mitigated through appropriate planning policies. Hence the plan is not meeting the duty to co-operate.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: My name is *** Personal details have been removed ***; I am a resident of Axminster. My email Address is *** Personal details have been removed *** The online consultation did not allow me to input my details any other way.

Dan Lakeman

Full name: Dan Lakeman

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

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: If the majority of the people in the district DO NOT want this to happen, how can it possibly be legally compliant? You are elected by us to represent us. None of this represents what the people of East Devon want - if you leave your offices once in a while, you'd realise that.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Scrap it completely. Utterly wrong

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.: As above

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.: Scrap the whole development

4. Do you consider that this part of the Development at the West End 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.: To get it scrapped

B and CA Lambert

Full name: B and CA Lambert

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As residents of Church Street for 42 years, we write to object to the scale of development planned as it is incompatible with spatial strategy. We have had our front wall knocked on numerous occasions by vehicles (both large and small) and find it difficult to walk to the square and beyond owing to the traffic not obeying the 'give way' priority signs and there is no pavement. It is dangerous for children walking to the primary school, as well as elderly people. The proposed site forms part of the 'green wedge' between Whimble and Cranbrook and would destroy the individual character and identity of this old cider village. The green wedge is home to wildlife and any development of this area would be contrary to EDDC emerging local plan policy PB03: Protection of irreplaceable habitats and important features. Has there been any flooding assessment done?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We would therefore like to see the modification of site Whim_08 being removed from the EDDC emerging local plan and the houses being allocated elsewhere, outside of Whimble where there is appropriate infrastructure.

Graham Lance

Full name: Graham Lance

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

* The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

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

Emma Lander

Full name: Emma Lander

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Andrew Eric Langman

Full name: Andrew Eric Langman

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.: SE11

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: I support this policy and believe it to be legally compliant

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.: I fully support the adoption of this policy with a few tweaks to tighten the policy against it be misconstrued, misinterpreted or having unforeseen consequences by omission of policy specific detail. The following suggestions for amendments and additions to the draft text are proposed based on experience of local residents in how the new owner of Salcombe Regis Caravan and Camping park has deployed numerous legal experts over the last 3 years to try every trick in the book and seemingly endless attempts to re-imagine existing planning permissions and bypass local consent for changes that would drastically alter the mix and type of accommodation provided, the season of use and the impact on the local community. Had this policy been in place 3 years ago, a huge amount of planning officer workload and local resident angst would have been avoided.

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.:

Amendments to second introductory paragraph of the policy as the original was silent on: changes (as different to extensions) and requirement for compliance to other pertinent policies and existing planning permissions ... as follows :

Proposals for the change to, extension of, or related and ancillary facilities on, existing sites will be permitted provided they align to other pertinent policies, comply with existing planning permissions and meet the following criteria in full:

Additional criteria to be added following bullet point A as the original was silent on several important policy specific matters ... as follows:

A1. No re-designation of camping pitches to touring pitches or of touring pitches to permanent pitches are to be provided;

A2. No change to the dates of seasonal use restriction is to be provided;

A3. No change from seasonal use to all-year use is to be provided;

A4. No change of use from holiday accommodation to residential accommodation is to be provided;

A5. No reduction of on-site green spaces or recreational amenities is to be provided;

Amendments to bullet point C. of the policy as the original is largely silent on local impact ... as follows:

C. The proposal would not have an adverse impact on local character or the amenities of the local community;

Amendments to bullet point E. of the policy to clarify that the proposal should include for provision of services and utilities ... as follows:

E. The proposal will provide for adequate services and utilities;

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

Alison Large

Full name: Alison Large

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Plans for development of the 2 sites in Whimble need to take into consideration the capacity that Whimble has for 80+ homes which will have 1, possibly 2, cars each. The housing plans MUST include space for residents vehicles. Transport considerations for traffic through the village needs to be thought of as access through the narrow streets is already an issue and causes problems, including damage to property and trucks getting stuck under the railway bridge.

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

Mr Nicholas Larkin

Full name: Mr Nicholas Larkin

Proposal:

5. Development in the Towns and Villages

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

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

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

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

The development proposed could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to Policy OL01 * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich in hedgerows across the site, contrary to Paragraph 13.9 * The Habitats Regulations assessment (30/01/25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with Policy OL09 and Policy PB04. * "Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. it would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with Policy ARO1B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. this is contrary to Policy TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, beach and the like) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to Policy OL05 of the Local Plan.

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

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

Barry Charles Laver

Full name: Barry Charles Laver

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo_20 is the major proposal towards Exmouth's housing target and should not extend anywhere near the B3179. The beauty of the countryside, far from being protected, would be completely lost and fail to preserve the separate identities of Exmouth and Budleigh Salterton contrary to POLICY OL05 of the LocalPlan.

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

Jamie Lawrence

Full name: Jamie Lawrence

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

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

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: N/A

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I can't comment on whether the draft local plan has been developed in a legally-compliant way, as I do not have legal training and am not privy to the processes followed.

However, it is important to point out that in previous consultations, feedback from the community – including a petition signed by over 500 residents – was not taken into consideration because it did not come via Common Place.

This very important feedback from the local community was not reported to the Strategic Planning Committee by EDDC, undermining and ignoring the views of those from Feniton with both knowledge and a stake in the future of the village.

The Common Place system, EDDC's preferred method of commenting, is complex and time-consuming to use, making it harder for residents – especially those lacking digital skills – to make their views known. This is discriminatory, undemocratic and goes against British Values.

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

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

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

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

Overall, the proposals feel rushed, ill thought through and at odds with infrastructure constraints in the village. My major concern is the lack of sustainability with these proposals.

Notably, at the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development. What has changed since then? Only the Flood Alleviation Scheme (FAS) has started.

Overall, it feels there has been a total disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.

Community cohesion within the village would be destroyed, with the current residents feeling disregarded and unvalued, with our concerns and lives being steamrollered by a Council which doesn't understand the area or our concerns, and new residents being brought in who will be adding to the issues of our village. The "old" and "new" residents will struggle to co-exist peacefully, and presumably this community cohesion has been disregarded in any planning.

In terms of sustainability, there are multiple serious issues. Firstly, a lack of adequate transport. All the roads into Feniton are very narrow, with major pinch points, they're mostly unlit and unsuitable for heavy traffic. This became very apparent recently when the Ottery Road/Green Lane junction was closed for the FAS works. Delays were inevitable and extensive and disruptive. This would get a lot worse under the new proposals.

Flooding at Patterson's Cross would also be a major issue. It will flood during heavy rain, as noted by the FAS developers. All vehicles will then need to access the village via the Old Village, or via the A373 and M5. These lanes are not suitable for heavy traffic, which will get much worse should the proposals go ahead.

Furthermore in terms of infrastructure, the current primary school in Feniton is at capacity and in need of a building upgrade, which could not happen on the current site as it is not big enough. Local GP services are also at capacity – where would the residents in the new houses go?

The only concession to the infrastructure challenges in the proposals seems to be 1060m of new water mains pipes to be laid by 2035.

Specific comments related to flooding and sewerage in the village:

Flooding is a massive issue in Feniton and it does not seem like EDDC has considered historic flooding, including raw sewage, when putting together these proposals. Previous promises of flood risk alleviation measures from developers have not resulted in any action.

The Flood Alleviation Scheme (FAS) developers have said that it will increase the flooding risk at Patterson's Cross, which already floods in heavy rainfall. Adding more houses – and increased flooding risk from the development, without additional alleviation measures – seems ill-advised. The FAS has been designed to handle the existing flooding risk, not scoped to deal with increased risks from major developments.

Finally, it's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding. It is well documented that roads and homes often flood with raw sewage.

Specific comments on disproportionate allocation:

Devon Communities Together (DCT) identified a local need for only 13 new dwellings up to the year 2027 – this was funded by EDDC. Therefore the number of new houses in the draft plan does not make any sense and is in no way aligned to what was identified in the survey.

After the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy. How can this in any way be justified?

Overall, the proposed development is massive for a tier 4 village and can't be justified in any way based on local need.

Specific comments on employment site, known as Otry_20:

I do not understand the thinking behind this location, the site is fundamentally unsafe.

The entrance will be off Green Lane, a mostly single track road – with some parts not even wide enough for a car to pass a pedestrian without the pedestrian pressing themselves into the hedge. The road is unlit, has many pinch points, blind bends, very few pavements and two single track bridges over the railway line, one of which has a blind bend. See this video on YouTube detailing some of the massive issues here: <https://www.youtube.com/watch?v=6q7DQ6mpgh4>.

It should also be noted that Feni_08 accessed via Broad Lane has very similar issues to Green Lane.

Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. How has EDDC even had enough time to consider all the evidence effectively to make a decision? Especially in light of how big the site is and its impact on the village. The sheer size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

It also has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton. This makes absolutely no sense and is negligent considering Feniton is a Tier 4 Village.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy AR01 – C Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45 Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E. Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The plan needs to be sustainable – and that means reflecting the Tier 4 status of Feniton in these proposals. The Strategy and Vision needs to be realigned, until adequate infrastructure and mitigation has been put into place.

In terms of actions, that means:

Removal of Feni_08 from the draft local plan, and at least a reduction in the number of houses allocated for Feni_05.

Removal of Otry_20 from the draft local plan.

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

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

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

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

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

Full name: Jamie Lawrence

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I can't comment on whether the draft local plan has been developed in a legally-compliant way, as I do not have legal training and am not privy to the processes followed.

However, it is important to point out that in previous consultations, feedback from the community – including a petition signed by over 500 residents – was not taken into consideration because it did not come via Common Place.

This very important feedback from the local community was not reported to the Strategic Planning Committee by EDDC, undermining and ignoring the views of those from Feniton with both knowledge and a stake in the future of the village.

The Common Place system, EDDC's preferred method of commenting, is complex and time-consuming to use, making it harder for residents – especially those lacking digital skills – to make their views known. This is discriminatory, undemocratic and goes against British Values.

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

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

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

NOTE: I am unable to attach my name to this form in Commonplace. My name is Jamie Lawrence and I am a resident of Feniton.

Overall, the proposals feel rushed, ill thought through and at odds with infrastructure constraints in the village. My major concern is the lack of sustainability with these proposals.

Notably, at the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development. What has changed since then? Only the Flood Alleviation Scheme (FAS) has started.

Overall, it feels there has been a total disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.

In terms of sustainability, there are multiple serious issues. Firstly, a lack of adequate transport. All the roads into Feniton are very narrow, with major pinch points, they're mostly unlit and unsuitable for heavy traffic. This became very apparent recently when the Ottery Road/Green Lane junction was closed for the FAS works. Delays were inevitable and extensive and disruptive. This would get a lot worse under the new proposals.

Flooding at Patterson's Cross would also be a major issue. It will flood during heavy rain, as noted by the FAS developers. All vehicles will then need to access the village via the Old Village, or via the A373 and M5. These lanes are not suitable for heavy traffic, which will get much worse should the proposals go ahead.

Furthermore in terms of infrastructure, the current primary school in Feniton is at capacity and in need of a building upgrade, which could not happen on the current site

as it is not big enough. Local GP services are also at capacity – where would the residents in the new houses go?

The only concession to the infrastructure challenges in the proposals seems to be 1060m of new water mains pipes to be laid by 2035.

Specific comments related to flooding and sewerage in the village:

Flooding is a massive issue in Feniton and it does not seem like EDDC has considered historic flooding, including raw sewage, when putting together these proposals. Previous promises of flood risk alleviation measures from developers have not resulted in any action.

The Flood Alleviation Scheme (FAS) developers have said that it will increase the flooding risk at Patterson's Cross, which already floods in heavy rainfall. Adding more houses – and increased flooding risk from the development, without additional alleviation measures – seems ill-advised. The FAS has been designed to handle the existing flooding risk, not scoped to deal with increased risks from major developments.

Finally, it's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding. It is well documented that roads and homes often flood with raw sewage.

Specific comments on disproportionate allocation:

Devon Communities Together (DCT) identified a local need for only 13 new dwellings up to the year 2027 – this was funded by EDDC. Therefore the number of new houses in the draft plan does not make any sense and is in no way aligned to what was identified in the survey.

After the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite

the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy. How can this in any way be justified?

Overall, the proposed development is massive for a tier 4 village and can't be justified in any way based on local need.

Specific comments on employment site, known as Otry_20:

I do not understand the thinking behind this location, the site is fundamentally unsafe.

The entrance will be off Green Lane, a mostly single track road – with some parts not even wide enough for a car to pass a pedestrian without the pedestrian pressing themselves into the hedge. The road is unlit, has many pinch points, blind bends, very few pavements and two single track bridges over the railway line, one of which has a blind bend. See this video on YouTube detailing some of the massive issues here: <https://www.youtube.com/watch?v=6q7DQ6mpgh4>.

It should also be noted that Feni_08 accessed via Broad Lane has very similar issues to Green Lane.

Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. How has EDDC even had enough time to consider all the evidence effectively to make a decision? Especially in light of how big the site is and its impact on the village. The sheer size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.

It also has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton. This makes absolutely no sense and is negligent considering Feniton is a Tier 4 Village.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy AR01 – C Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45 Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E. Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The plan needs to be sustainable – and that means reflecting the Tier 4 status of Feniton in these proposals. The Strategy and Vision needs to be realigned, until adequate infrastructure and mitigation has been put into place.

In terms of actions, that means:

Removal of Feni_08 from the draft local plan, and at least a reduction in the number of houses allocated for Feni_05.

Removal of Otry_20 from the draft local plan.

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

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

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

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

Guy Lawrence

Full name: Guy Lawrence

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal for 50 dwellings on land west of Bromley Gardens (Whim_08a) is out of proportion with the size of the village, especially as 33 new homes are already earmarked at Station Road. It is situated on land previously allocated as a green wedge between Whimble and Cranbrook, as such the proposal would erode protection against encroachment on the village. In addition, Church Road, which provides access to Bramley Gardens is a busy, narrow lane without pavement. Additional traffic associated with this development will lead increase the danger to pedestrians.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to the original proposal to only develop the land at Station Road (keeping that to 33 dwellings). Failing that, significantly decrease the number of homes to no more than 12.

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

Matthew Lawson

Full name: Matthew Lawson

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site has already been rejected from inclusion in the Local plan on three separate occasions.

The development would increase the risk of further and more regular flooding downstream of the plot. In recent years engineering of the banks of the stream passing Sleuton Crescent has failed and needed to be replaced or repaired and recent flood events have been the worst in memory. Climate change will only increase the likelihood of flooding and increase the chance of properties being flooded/damaged and it is unlikely future developments will adequately mitigate flood risk.

The village access roads are not of sufficient width or quality to allow a safe increase in the volume of traffic. The village has suffered from speeding drivers (as evidence by the Parish Council introducing a speed watch) and drivers not driving with due care and attention through the centre of the village which lacks pavements. Being a rural area, horse riding, livestock movements and cyclists are common and would their safety would be put under threat by an increase in commuter traffic.

EDDC had previously designated the site as Land of Local Importance, which should not be built upon and should be used for activities which retain its open nature

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The proposal doesn't take into account that current GP medical centres and the local school are at or near capacity and it is unlikely that these could be scaled up fast enough to keep pace with the rise in population.

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

Frances Leaning

Full name: Frances Leaning

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Stephen Lee-Kelland

Full name: Stephen Lee-Kelland

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(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.:

Policy AR03 has significant impact on development and investment in East Town Sidmouth for up to 90 years beyond the five year lifetime of the Local Plan.

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.: According to the NPPF "186. Local planning authorities should limit the planned lifetime of development in a Coastal Change Management Area through temporary permission and restoration conditions, where this is necessary to reduce a potentially unacceptable level of future risk to people and the development."

If a building will fall into the sea in 30 years any improvements to the building are naturally of limited lifetime. There is no need to ban improvements such as extensions in a CCMA because they are naturally temporary in these areas.

The NPPF does not authorise Local plans to ban all domestic improvements.

It is also the case that Local Plans have a five year duration. As such they cannot bind developments for the next 100 years. Attempts to do this should lead to valid claims from landowners for compensation if it becomes apparent that a prediction that land will be lost to the sea in 100 years is false.

The wording of the Local Plan Policy AR03 should be amended from paragraph 3 to:

"In parts of the CCMA expected to be at risk within a 0-to20-year time horizon (2020 to 2040), all developments are temporary. During the period of this Plan the following developments will be permitted:

A. Temporary development directly related to the coast, such as beach huts, cafes, car parks or sites used for touring caravan and camping B. Temporary modifications to other existing commercial facilities where a positive link can be made to the local economy; C. Mitigation measures for dealing with coastal change that are in accordance with the relevant coastal strategy; or D. Nationally significant infrastructure projects related to offshore development that are constructed to withstand the impacts of the expected coastal change." E. Home improvements such as extensions where it is understood that the improvement will not survive the home.

The rest of the section, up to paragraph 7.9 (headed Justification for Policy) should be deleted.

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.: Policy AR03: Coastal Change Management Areas (CCMAs) is not sound.

Estimates of coastal erosion in East Beach vary from 20m in 100years to 150m in 100 years. The estimate used in the Local Plan seems to be the highest estimate to date.

In the Sidmouth & East Beach Management Plan (Coastal Processes Baseline), commissioned by EDDC, the East Beach at Sidmouth is not projected to erode as far as

Cliff Road in 100 years <20m. Yet in the Local Plan the erosion is predicted to erase most of Beatlands Road (150m in 100yrs).

See https://eastdevon.gov.uk/media/1676177/sidmouth-bmp_coastal-processes-baseline_final_20-01-2016.pdf and <https://eastdevon.gov.uk/media/0q5lai3a/cfl-007-ccma-methodology.pdf>

It can never be sound to adopt the most extreme prediction for events as a basis for policy.

The huge difference between predictions is to be expected when predicting over a time line of 50-100 years. The Council should limit its policy to what is likely in the next five years (the life of the Local Plan). To do otherwise is not sound.

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.: The wording of the Local Plan Policy AR03 from paragraph 3 should be amended to:

"In parts of the CCMA expected to be at risk within a 0-to20-year time horizon (2020 to 2040), all developments are temporary. During the period of this Plan the following developments will be permitted:

A. Temporary development directly related to the coast, such as beach huts, cafes, car parks or sites used for touring caravan and camping B. Temporary modifications to other existing commercial facilities where a positive link can be made to the local economy; C. Mitigation measures for dealing with coastal change that are in accordance with the relevant coastal strategy; or D. Nationally significant infrastructure projects related to offshore development that are constructed to withstand the impacts of the expected coastal change." E. Home improvements such as extensions where it is understood that the improvement will not survive the home.

The rest of the section, up to paragraph 7.9 (headed Justification for Policy) should be deleted. (all mention of 20-100 yrs should be removed)

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 people who wrote the Local Plan seem unaware of the Sidmouth Beach Management Scheme. This scheme is receiving £16.5 m from the Environment Agency. It will completely change the predictions for East Beach Sidmouth. It may even prevent erosion.

The whole of the CCMA for East Beach will be incorrect.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Policy AR03: Coastal Change Management Areas (CCMAs) is entirely inappropriate for Sidmouth East Beach It will blight East Town Sidmouth.

Charlotte Lemon

Full name: Charlotte Lemon

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is closer to Budleigh Salterton than Exmouth. This would make Budleigh its most convenient and accessible town. Infrastructure and services in Budleigh would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. The over stretched infrastructure, facilities and services is not fit for purpose at present.

Exmo_20 would harm the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the site selection methodology and POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at St John in the Wilderness Grade 2 listed church, eroding the attractive rural setting for worship and burials. The heritage assets are Saxon, Norman and Medieval. This is contrary to POLICY HE02.

Exmo_20 would cause detrimental effect on the open countryside and designated wildlife sites nearby. This would eliminate the “tranquility, wildness and dark skies” which is contrary to POLICY OL01.

Exmo_20 would increase the need for car travel. It will increase traffic congestion on an already dangerous and unsafe road. The increase in traffic connections is in conflict with paragraph 11.2. The isolated location provides unsustainable development as residents would need to travel further than 800m to existing key services and facilities contrary to paragraph 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Exmo_20 is in conflict with POLICY OL19 and PB04 as the Habitats Regulations Assessment states there is currently “not sufficient certainty to rule out adverse effects in integrity in relation to air quality”. the main site access proposed is opposite SAC/SPA.

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

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

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

Margaret Leppard

Full name: Margaret Leppard

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.: National and local government's approach to housing The national focus, particularly in recent months has been on numbers of houses to be built. This approach fails to ensure that the right types of houses are built in the right place. Government depends on commercial house builders who in turn, depend on building estates of similar properties on sites that yield economies of scale. Similar calculations limit the number of social housing units that are included in developments. Should economic conditions and supply lines change during the course of development work, social/affordable housing units are first to be reduced or abandoned. Throughout the country, there is housing stock that is abandoned and deteriorating; properties purchased and kept empty until 'market conditions are more favourable'; second homes some of which are constantly in use by 'together-apart' families; second homes used as family holiday homes/ holiday lets and increasing numbers of properties used for short term lets and Air B&B. Current legislation and tax regimens lack power to mobilise these properties for those in genuine need of housing. Central government and councils, including EDDC, need to achieve a more equitable balance between local housing needs and the tourist market. Furthermore, the high proportion of holiday lets in an area with a constant throughput of visitors threatens the development of social capital and health among permanent residents. The numbers of similar 3-4 bedroom properties that developers create also fail to meet the needs of residents. For example, in Seaton there is significant need for social housing. Local working age residents are primarily involved in hospitality, retail and some are carers. These are not high paying forms of employment. 3-4 bedroom new build houses are unlikely to be affordable for this demographic. Also in Seaton (and nationally) there is a need for different types of housing that meets the needs for multigenerational living; for disabled residents requiring easy access and internal adaptations; for small units for single occupancy. Simply building more numbers on 'same old, same old' estates will not work for community members! Innovative use of

existing housing stock requires council officers and legal teams. Importantly it is only now that the national government acknowledges the lack of builders for new builds, repair and renovation. Not all councils have inspectors and officers to monitor and follow up, access, repair and renovate existing housing stock. There is a need for government and councils to both think and act in radically different ways about equitable housing.

Full name: Margaret Leppard

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. 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.: Infrastructure first

Continuing to place the development cart before the infrastructure horse at every level only leads to a downward spiral in overall human and environmental wellbeing. I join with other contributors to this consultation to highlight the paucity of health services; primary and secondary education; transport and highways; surface water and sewage systems to support new development. With experience of internal residential flooding I highlight that tertiary technical education for essential building trades and technicians to ensure resilient housing design; ongoing monitoring and maintenance of common areas and sustainable urban drainage systems (SUDS) has received little attention. Therefore development of SEAT_02, 03, 05 and _13a threatens existing adjacent properties and environment. Legislative infrastructure also needs change. In the context of climate crisis; nature based solutions to address flooding; and top down imposition of housing targets, national legislation needs updating in relationship to land registry, riparian rights and responsibilities and use of water courses.

Full name: Margaret Leppard

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

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

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

Introduction I have previously found the use of Commonplace clunky. Furthermore Commonplace tightly frames the consultation in terms of the council and central government asking the ‘first questions’. The programme also limits narrative of the lived experience of current residents. Place making procedures value these narratives. My comments in this document refer primarily to Seaton (level 2 settlement) and to planned housing sites, the local environment and economic development. I object to the inclusion of SEAT_02, 03, 05 and _13a in the EDDC Strategic Plan for the following reasons. National and local government’s approach to housing The national focus, particularly in recent months has been on numbers of houses to be built. This approach fails to ensure that the right types of houses are built in the right place. Government depends on commercial house builders who in turn, depend on building estates of similar properties on sites that yield economies of scale. Similar calculations limit the number of social housing units that are included in developments. Should economic conditions and supply lines change during the course of development work, social/affordable housing units are first to be reduced or abandoned. Throughout the country, there is housing stock that is abandoned and deteriorating; properties purchased and kept empty until ‘market conditions are more favourable’; second homes some of which are constantly in use by ‘together-apart’ families; second homes used as family holiday homes/ holiday lets and increasing numbers of properties used for short term lets and Air B&B. Current legislation and tax regimens lack power to mobilise these properties for those in genuine need of housing. Central government and councils, including EDDC, need to achieve a more equitable balance between local housing needs and the tourist market. Furthermore, the high proportion of holiday lets in an area with a constant throughput of visitors threatens the development of social capital and health among permanent residents. The numbers of similar 3-4 bedroom properties that developers create also fail to meet the needs of residents. For example, in Seaton there is significant need for social housing. Local working age residents are

primarily involved in hospitality, retail and some are carers. These are not high paying forms of employment. 3-4 bedroom new build houses are unlikely to be affordable for this demographic. Also in Seaton (and nationally) there is a need for different types of housing that meets the needs for multigenerational living; for disabled residents requiring easy access and internal adaptations; for small units for single occupancy. Simply building more numbers on 'same old, same old' estates will not work for community members! Innovative use of existing housing stock requires council officers and legal teams. Importantly it is only now that the national government acknowledges the lack of builders for new builds, repair and renovation. Not all councils have inspectors and officers to monitor and follow up, access, repair and renovate existing housing stock. There is a need for government and councils to both think and act in radically different ways about equitable housing. Infrastructure first Continuing to place the development cart before the infrastructure horse at every level only leads to a downward spiral in overall human and environmental wellbeing. I join with other contributors to this consultation to highlight the paucity of health services; primary and secondary education; transport and highways; surface water and sewage systems to support new development. With experience of internal residential flooding I highlight that tertiary technical education for essential building trades and technicians to ensure resilient housing design; ongoing monitoring and maintenance of common areas and sustainable urban drainage systems (SUDS) has received little attention. Therefore development of SEAT_02, 03, 05 and _13a threatens existing adjacent properties and environment. Legislative infrastructure also needs change. In the context of climate crisis; nature based solutions to address flooding; and top down imposition of housing targets, national legislation needs updating in relationship to land registry, riparian rights and responsibilities and use of water courses. Policy dissonance - where do priorities lie? Nature based tourism? Seaton along with other areas in East Devon promotes itself as a destination for nature based tourism. However, the draft Strategic Plan still proposes SEAT_02, 03, 05 and _13a for development. Other contributors to the consultations have commented on the impact of these sites on the local environment and ecology. The Seaton Tramway has recently invested in an additional stop for tourists to access the wetlands. However recent planning applications have not included any visualisation data from the top of the tram or from the new stop. How can we genuinely promote nature based tourism when the view to the west is of housing estates? Also visible from the B3172 and Harepath Road! Finally, flood risk In the same way that we lack technicians and legal instruments to deal with adolescent drainage technologies, I argue that recently published research (see below) demonstrates that planning guidance as it relates to SEAT_02, 03, 05 and _13a is behind the curve in relation to climate change and flood risk. In the course of my experience with field based SWW and DCC Flood and coastal risk and highways staff they do their best in a resource and planning guidance constrained workplace. This carries its own personal stress toll. However, development before infrastructure in economic terms simply externalises

costs onto the ‘little people’ be they flood victims or junior staff. Beware of blindfolded decision making about strategic planning for SEAT_02, 03, 05 and _13a when You do not have access to key upcoming reports ‘Water cycle report’ (EDDC) and “Assessment of flood risk from surface water and ordinary watercourses in Seaton’ (DCC) A recent Planning committee based decisions on Google Maps Street View that excluded visualisation of critical SUDS receiving watercourses in spate. Water attenuation across the sites is likely to be critically dependent on poorly maintained attenuation basins and permeable paving (and water butts?)

Source: <https://www.susdrain.org/delivering-suds/using-suds/suds-principles/management-train.html> despite the challenging context of

- increasing short duration high intensity rainfall;
- infiltration being excluded from the SUDS train because of the underlying local geology and finally,
- limited effective legal instruments and qualified technicians exist to ensure effective ongoing maintenance of common areas and SUDS. May you be wise in your decision making!

Full name: Margaret Leppard

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.: AR01

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.: Finally, flood risk In the same way that we lack technicians and legal instruments to deal with adolescent drainage technologies, I argue that recently published research (see below) demonstrates that planning guidance as it relates to SEAT_02, 03, 05 and _13a is behind the curve in relation to climate change and flood risk. In the course of my experience with field based SWW and DCC Flood and coastal risk and highways staff they do their best in a resource and planning guidance constrained workplace. This carries its own personal stress toll. However, development before infrastructure in economic terms simply externalises costs onto the ‘little people’ be they flood victims or junior staff.

Beware of blindfolded decision making about strategic planning for SEAT_02, 03, 05 and _13a when You do not have access to key upcoming reports ‘Water cycle report’ (EDDC) and “Assessment of flood risk from surface water and ordinary watercourses in Seaton’ (DCC) A recent Planning committee based decisions on Google Maps Street View that excluded visualisation of critical SUDS receiving watercourses in spate. Water attenuation across the sites is likely to be critically dependent on poorly maintained attenuation basins and permeable paving (and water butts?)

[Image illustrating SUDS Principles available in PDF attached] Source: <https://www.susdrain.org/delivering-suds/using-suds/suds-principles/management-train.html> despite the challenging context of

- increasing short duration high intensity rainfall;
- infiltration being excluded from the SUDS train because of the underlying local geology and finally,

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

- limited effective legal instruments and qualified technicians exist to ensure effective ongoing maintenance of common areas and SUDS. May you be wise in your decision making!

Full name: Margaret Leppard

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.: SE10

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.: Policy dissonance - where do priorities lie? Nature based tourism? Seaton along with other areas in East Devon promotes itself as a destination for nature based tourism. However, the draft Strategic Plan still proposes SEAT_02, 03, 05 and _13a for development. Other contributors to the consultations have commented on the impact of these sites on the local environment and ecology. The Seaton Tramway has recently invested in an additional stop for tourists to access the wetlands. However recent planning applications have not included any visualisation data from the top of the tram or from the new stop. How can we genuinely promote nature based tourism when the view to the west is of housing estates? Also visible from the B3172 and Harepath Road!

Mrs Helen Lester

Full name: Mrs Helen Lester

Proposal:

5. Development in the Towns and Villages

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

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I believe that the proposed development of site EXMO_17, which by its very nature will mean an extension of Exmouth eastward on the currently undeveloped East Devon National Landscape (formerly AONB) towards Budleigh Salterton. Inclusion of EXMO_17 in the East Devon District Council Local Plan fundamentally fails the "Consistent with national policy" soundness test due to severe conflicts with statutory protections, national planning policy, and local policy obligations.

1. Direct Conflict with National Planning Policy Framework (NPPF) The National Planning Policy Framework (NPPF) provides unequivocal legal protection for National Landscapes: Paragraph 176: The highest level of protection must be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Development should be strictly limited in these areas. The proposed extension fundamentally contradicts this principle, as it represents large-scale urban encroachment into a protected landscape. Paragraph 177: Major development in a National Landscape should be refused unless it passes exceptional circumstances tests and is in the public interest. This proposal fails every test: No overriding need: Housing or economic growth objectives do not constitute exceptional circumstances, particularly when alternative sites exist outside protected areas. Alternative locations exist: Other areas within East Devon can accommodate growth without violating protected land status. Severe environmental and landscape harm: The development irreversibly damages the area's ecological integrity, scenic character, and ecosystem services. Legal Precedent: High Court rulings have consistently upheld AONB/National Landscape protections, ruling

that "economic development" or "housing targets" do not override statutory protection. The approval of this proposal would invite an immediate legal challenge.

2. Breach of Statutory Duty Under the Countryside and Rights of Way Act 2000 (CROW Act, Section 85) Section 85 of the CROW Act places a mandatory legal duty on public authorities to conserve and enhance the natural beauty of National Landscapes. Any decision that fails to give "great weight" to protection is unlawful. By approving this proposal, East Devon District Council would be in breach of this duty, making the plan legally indefensible and subject to judicial review.

3. Direct Contradiction of the East Devon Local Plan and Policy Framework The proposed extension also fails to comply with East Devon's own planning policies, making it internally inconsistent and thus unsound: Strategy 46: Landscape Conservation and Enhancement and AONBs Requires that development must enhance, not harm, the special qualities of National Landscapes. The proposal would cause irreversible harm, violating this policy outright. Policy D1: Design and Local Distinctiveness Development must respect and protect local landscape character. The urban expansion into protected countryside undermines the distinctive rural and coastal identity of Budleigh Salterton and its surroundings. Urban Sprawl Prevention & Settlement Separation The merging of Exmouth and Budleigh Salterton is a serious planning concern. National and local policy explicitly protect the distinctiveness of settlements, ensuring they are not lost to uncontrolled expansion.

4. Environmental Destruction and Irreversible Harm The East Devon National Landscape is one of the most ecologically valuable and visually iconic landscapes in the UK. Development would result in: Biodiversity loss: This area hosts legally protected species and priority habitats under the Wildlife and Countryside Act 1981 and the UK Biodiversity Action Plan. Destruction of irreplaceable ecosystems: The undeveloped land acts as a natural carbon sink, floodplain, and wildlife corridor. Increased climate risk: Removing these natural defences increases flood risk, reduces climate resilience, and worsens ecological degradation.

5. Legal Risk of Judicial Review and Government Intervention This proposal is legally indefensible. If included in the Local Plan: It is highly likely to be legally challenged under the CROW Act and NPPF non-compliance. Past judicial reviews have struck down developments in National Landscapes where local authorities failed to provide a lawful justification. Conclusion: The Local Plan is Unsound and Legally Indefensible This proposal directly contradicts national policy, breaches statutory duties, violates East Devon's own Local Plan, and would likely be overturned in court. To remain legally compliant, policy-consistent, and defensible, East Devon District Council must exclude this proposal from the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: EDDC should not pursue development in EXMO_17 because they would breach planning law and ultimately would end up in years of litigation and only the Government has the power to change planning law, not EDDC.

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

Dvaid Lewis

Full name: Dvaid Lewis

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

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 has to be easily read to be understood, language can be discriminatory, where does it describe the plan for social/council housing?

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

Mr & Mrs Ley

Full name: Mr & Mrs Ley

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I write to object to the allocation of Whim_08 (land west of Bramley Gardens on the 1st November 2024 in the EDDC Emerging Local Plan.

I object on the basis of soundness. On 1st October 2024, just 30 days earlier, the EDDC Strategic Planning Committee rejected the Whim_08 site on the basis of:

* Scale of development incompatible with spatial strategy * Site lacks safe and convenient pedestrian access to services and facilities in the village * The site forms part of the 'Green Wedge' between Whimble and Cranbrook * Forms an important part of the very attractive rural landscape setting for the settlement * Potential impact on unconfirmed wildlife * Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation.

To our knowledge, none of these issues have been addressed.

As a resident of Church Road below Bramley Gardens, I can confirm that the site lacks safe pedestrian access to services and facilities in the village. With an additional 50

houses with potentially in excess of 100 pedestrians and a further 50 vehicles (at least), the pedestrian route to the village would be even more hazardous.

Residents of Church Road can already testify to the fact that the road is far too busy for a single track village road, with a constant stream of traffic driving past our homes.

The section between Bramley Gardens and the shop in the square is in many places single track with no pavement and cars are regularly stationary in the road waiting for a stream of traffic to pass before they can proceed. This leads to increased pollution to the village and even less space for pedestrians to walk safely to the facilities in the village.

In addition, the village is already struggling with drainage issues with the potential for flooding. Our own garden after just one day of rain becomes saturated and water logged with visible surface water which takes days to clear. With another estate of 50 homes, the run off could easily induce flooding to existing properties further down the hill.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Given the above list of ongoing and serious issues with the Whim_08 site we believe the decision to allocate 50 homes on this site should be reversed.

jayne lindsey

Full name: jayne lindsey

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live at Slewton Crescent, Whimble and strongly object to the proposed development at Whimble_11 for all the reasons cited in the parish councils response, including unsuitable road access leading to increased traffic through the village, the need to preserve natural habitat and especially the problem of drainage and flooding. This winter saw significant flooding of the stream running alongside Slewton crescent despite the banks having been reinforced in recent years- the first time this has occurred since before this work was undertaken.

Maureen Lister

Full name: Maureen Lister

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is closer to Budleigh Salterton. This would be a disaster for Budleigh which does not have the services or infrastructure for more people. It would lead to Budleigh and Exmouth becoming one conurbation which would go against the differing preferences of residents in both areas. It would conflict with the POLICY OL05 of the Local Plan.

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

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

C S LO

Full name: C S LO

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to strongly oppose the proposed allocation of land at Kings Road (Honi_18) for 136 homes, as outlined in the emerging East Devon Local Plan. As a resident of Kings Road, I believe this allocation fails to meet several aspects of the test of soundness as required by Regulation 19 and the National Planning Policy Framework (NPPF). My primary concerns relate to whether the plan is Positively Prepared, Justified, Effective, and Consistent with National Policy.

1. Not Positively Prepared and Not Consistent with National Policy: Allocating 136 homes in this edge-of-town location, with significant and acknowledged pedestrian safety issues, limited existing facilities, and a demonstrable impact on the surrounding national landscape, does not represent a positively prepared strategy for sustainable development. It appears to prioritise housing numbers without adequately considering the environmental and social consequences, which is inconsistent with the principles of sustainable development promoted in the NPPF, particularly concerning the creation of healthy and safe communities (Paragraph 94).

2. Not Justified: I contend that this allocation is not justified due to a lack of robust evidence and a failure to adequately consider reasonable alternatives:

- **Honiton's Existing Allocation Levels:** It is my understanding that Honiton already has a significant number of housing allocations within this Local Plan. There is a serious question as to whether the town is being asked to accommodate a level of growth that exceeds its capacity in terms of existing facilities, infrastructure, and transportation networks. Pushing the level of housing allocation beyond the town's ability to absorb it sustainably further undermines the justification for this specific site.
- **Lack of Robust Evidence:** The Council has not provided sufficient evidence to demonstrate that the existing infrastructure, including pedestrian crossings on Kings Road, local roads, schools, healthcare facilities, and utilities, can cope with the additional demand from 136 homes. Where is the detailed transport assessment that

comprehensively addresses the cumulative impact of this and other proposed developments on traffic congestion and pedestrian safety? The landscape impact assessment also appears insufficient in light of the site's proximity to a valued national landscape. There is a lack of clear evidence demonstrating the specific need for this scale of development in this precise location, especially considering the existing challenges.

- **Failure to Consider Reasonable Alternatives:** Has the Council transparently considered other sites within Honiton or the surrounding area for this level of housing? What were these alternatives, and what were the specific reasons for their rejection in favour of Kings Road? Without this information, it is impossible to conclude that this allocation represents the most appropriate strategy.
- **Impact on Local Character:** There is a concern that the scale and design of 136 homes on this site may not be in keeping with the existing local character of Honiton and the surrounding area, further undermining the justification for this allocation in this sensitive location.
- **Lack of Community Engagement:** Was the community adequately consulted specifically on the allocation of this site for this scale of development? Were the concerns of local residents, particularly those living on Kings Road, properly taken into account in the decision-making process?

3. Not Effective: The proposed allocation raises significant concerns about whether it is effective and deliverable:

- **Deliverability Concerns due to Infrastructure Deficiencies:** The existing dangerous pedestrian crossing on Kings Road and the potential for increased traffic congestion raise serious questions about the deliverability of this site without significant and potentially costly infrastructure upgrades. There is no clear commitment or funding plan outlined for these necessary improvements.
- **Strain on Existing Facilities:** The lack of a supermarket on this side of town and the already stretched capacity of other facilities and infrastructure within Honiton (schools, healthcare, etc.) suggest that this development is not deliverable in a way that supports a thriving and sustainable community.

4. Not Consistent with National Policy (Further Points): This allocation appears inconsistent with several key aspects of the NPPF:

- **Protecting and Enhancing the Environment (Paragraph 174):** The development's location on the edge of a beautiful national landscape and the direct impact on residents' views clearly conflict with the policy to protect and enhance valued landscapes. The potential impact on local biodiversity also needs further investigation.

- Promoting Sustainable Transport (Paragraph 111): Locating a significant number of homes in an area with a known dangerous pedestrian crossing and limited public transport options (requiring crossing a busy road) does not prioritise sustainable transport modes.
- Loss of Green Space: The allocation likely involves the loss of green space that may be valued by the local community for recreation and amenity. The NPPF encourages the protection of such spaces.
- Precedent Setting: Approving this development could set an undesirable precedent for further unsustainable development on the edges of Honiton, further encroaching on the surrounding countryside. Suggestions and Conclusion: I reiterate my understanding of the need for housing within East Devon. However, the proposed allocation at Kings Road (Honi_18) presents significant and unacceptable challenges related to safety, infrastructure, landscape impact, and the overall sustainability of the development, especially when considered in the context of Honiton's already substantial housing allocation. If the Council insists on pursuing development in this area, the following are essential:
 - A detailed and independently reviewed traffic and crossing technical study must be completed and its recommendations fully funded and implemented before any development commences. This must deliver demonstrable and significant improvements to pedestrian safety on Kings Road.
 - Substantial investment in local infrastructure, including a supermarket on this side of town, expansion of existing schools and healthcare facilities, and improvements to utilities, must be secured and guaranteed.
 - A significant buffer zone must be established and rigorously protected between the development and the adjacent national landscape to mitigate visual and ecological impacts.
 - A thorough assessment of alternative sites that are more sustainable and less impactful on existing communities and the environment must be undertaken and made publicly available.
 - The Council must provide clear justification for the overall level of housing allocation within Honiton and demonstrate that the town's infrastructure and facilities can realistically accommodate this growth. I strongly urge the East Devon District Council to reconsider this unsustainable and unsound allocation and to prioritise alternative sites that better align with the principles of sound planning and the long-term well-being of the residents of Honiton and the protection of our valuable natural environment. Thank you for your thorough consideration of these significant concerns.

Melinda Lock

Full name: Melinda Lock

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: SSW cannot cope with the new developments already, as the past 2 years have proved with burst pipes and sewage spills into river and sea. The B3179 is already a dangerous road and it would be madness to build a large development with hundreds of cars accessing it.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not build!

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

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

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

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not build!

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Do not fill in the gap between Budleigh and Exmouth.

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

Jacqueline Lock

Full name: Jacqueline Lock

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Planning officer advised strategic planning committee exmo_20 was not suitable to be included in the local plan and gave good reasons for his recommendation Eagle Investments gave a presentation to the strategic planning committee on how Exmo_20 could be developed. Members of the committee from Lympstone recommended putting aside planning officers recommendation. Eagle investments are property developers who have built at Lympstone and advised strategic planning committee how the site Exmo_20 could be developed Sewage Infrastructure is already at Breaking point

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

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

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

These sites need removing from the local plan as will have a destructive impact on local businesses connected to tourism as these developments will destroy the beauty of the area and be detrimental to the local environment this will have an impact on jobs in

tourism and related industries that local towns depend on. It will also chip away at the green fields beauty of the local area that also contributes to tourism into the East Devon area as a whole, So not meeting need for jobs in tourism and not meeting other areas need for jobs in tourism The sites should not have been included as they are near Pebble bed Heaths and Bystock lake and other areas of scientific interest In the case of exmo_20 the Planning officer recommended that the site was unsuitable for development with sound reasons this advice needs to be followed and the site should not have been included in the draft plan

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Both sites are damaging to the environment and if developed reduce the natural beauty of the local area also will lead to increased footfall on Woodbury common and Bystock lakes Sewage infrastructure is already breaking down and insufficient for existing housing. Road access at Exmo_20 is onto the narrow road into Budleigh and access to the site is difficult Developments will increase traffic on the roads into Budleigh. Re Exmo_17 Traffic has already visibly increased on the Salterton Road with developments such as Plumb Park, The road into Budleigh from Exmo_20 is narrow with many hazards for instance there is a very tight corner at Inner Ting Tong this road is not suitable for heavy traffic flows Both sites reduce the green land between Budleigh and Exmouth

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

Stephen Lofthouse

Full name: Stephen Lofthouse

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Graham Long

Full name: Graham Long

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

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

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: The Spatial Strategy relies on a simplistic Sustainability Assessment conducted by EDDC to determine which settlements are sustainable and will be allowed housing development and which settlements are not sustainable and will not be allowed housing development 2020 to 2042. This assessment and the simplistic scoring of each settlement such that a score of 7 and over means a settlement is sustainable and a score of 6 or less means a settlement is unsustainable, was done without any consultation with local residents or parish councils. EDDC refuse to adjust their scoring following input from local residents. EDDC have not weighted the importance of each of the facilities and services scored in the assessment saying they did not have the time to apply weightings.

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Although the number of facilities and services EDDC consider could make a settlement sustainable was increased early in the process by EDDC from 10 to 11, the 6/7 cut of for sustainability was not adjusted by EDDC. I suggest that any settlement which has missed the sustainability score by 1 mark (i.e. scored 6 rather than 7) should be allowed to have their score increased by 1 such that they are considered sustainable (and allowed a small amount of limited housing development) if the local population, represented by the parish council consider that appropriate.

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.: A simplistic black and white tick box approach to the sustainability assessment and an arbitrary cut off at 6 and below =unsustainable, 7 and above =sustainable, without consultation with parish councils and local residents casts any settlement scoring 6 or less in aspic and condemns that settlement to stagnation and decline for the next 18 years and has means that young people are forced to move away when they start their own families and no new homes will be available where they grew up. It has serious consequences for the viability of existing primary schools in such "unsustainable" settlements. It has serious consequences for local businesses, such as village pubs and local community hubs like village halls

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 EDDC Local Plan 2020 to 2042 should reflect the growth needs of local communities and not be a masterplan forced on local communities from above. Each settlement that has a sustainability score of 6 should be allowed to have their score increased by one point to 7 if they consider that their parish/village/settlement is sustainable and they want small organic growth of their settlement as recommended by the CLA who call for a return to a policy which promotes organic incremental growth in settlements of fewer than 3,000 inhabitants..... A smaller number of houses in a larger number of villages would support the sustainability of rural areas reversing decades of settlements being held in aspic unable to incrementally grow to meet the changing needs of the community” - Para 5.1, CLA Recommendations in CLA report: Sustainable Communities; The Role of Housing in Strengthening the Rural Economy, 2022

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

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As previously stated, EDDC conducted sustainability assessments of settlements as a desk exercise, without consulting local residents and parish councils. In the case of my parish Upottery this resulted in a sustainability score of 6 and results on no new housing being allowed in the settlement before 2042. As EDDC have told me, "Upottery village will be considered to be open fields where development is not allowed". This condemns Upottery to stagnation and decline despite the fact that it is a thriving village. NB: Misleadingly, the table on page 34 of Spatial Strategic Policy SP03

shows Upottery to have a total housing requirement of 3 between 2020 and 2042. These 3 properties are barn conversions that have already been approved by EDDC before now, 2025. No development will be allowed between now and 2042 because EDDC gave Upottery a sustainability score of 6.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : Please see attached pdf; "FAO Planning Inspector". Understanding the growth and housing development needs of a community is difficult to do as a "paper exercise" and the deficiencies of EDDC's sustainability assessments demonstrate that. For that reason it is important to present those requirements "face to face" and that is why I consider it necessary to participate in the hearing session(s)

Kathleen Long

Full name: Kathleen Long

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmouth_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. . Exmouth_20 would destroy the 'tranquillity, wildness and dark skies' of the countryside, which is contrary to POLICY OL01. . Developing Exmouth_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. . The Habitats Regulations assessment (30.01.25) confirms that there is 'currently not sufficient certainty to rule out adverse effects in integrity in relation to .. air quality (East Devon Pebblebed Heaths SAC/SPA). Exmouth_20 is in conflict with POLICY OL09 and POLICY PB04. . Exmouth_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. .Exmouth_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. . Exmouth_20 would increase the need for car travel and increase traffic congestion in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1. . The main access point to Exmouth_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would

lead to coalescence of Budleigh and Exmouth, contrary to POLICY OLO5 of the local Plan.

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

Catherine Lord

Full name: Catherine Lord

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

John Loudon

Full name: John Loudon

Proposal: 15. Our Outstanding Historic Environment

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 15

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.:

Chapter 15 Scrutiny of planning permissions of individual developments that impact listed buildings/areas of special value are to be welcomed. Historical features can't be recovered once lost. However, it is surprising that larger developments that have a significant impact on such buildings/features seem to be less well scrutinized. For example, in Sidbury, many planning applications for individual family homes that are submitted are rejected. However, the application Sidm_34 which is not directly associated with an individual listed building e.g. Grade II listed Furzehill Farm, will have a significant negative impact on this listed building and many other buildings of historical significance. The scrutiny of individual listed building applications is pro rata much higher than for much larger developments. This cannot be a sound way of protecting local assets. In the above example it could be expected had Furzehill Farm requested planning permission for a small house within their curtilage, it would have been rejected. However, a plan for 43 houses, in a plot immediately adjacent to that land has been included in the local plan. This is not a consistent approach to preserving areas of significant character in the area.

Branco Love

Full name: Branco Love

Other party name (if relevant): Jenny Love

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Whim_08a- This paragraph contradicts the previous agreed plans as to the extent of the 'Green Wedge' to prevent coalescence and keep Whimble distinct from adjoining settlements. The scale of the development in relation to the size of the village is inappropriate.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I'm not legally trained, I don't understand what you mean. However, deleting this paragraph would, I believe, resolve the situation. In other words, no 50 house, etc.

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

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

The impact on the village has not been assessed. The School is at capacity, and were it not for the trustees of the Victory Hall allowing their premises to be used for lunches, lessons and other activities, it wouldn't be able to function. The availability of train travel is often stated. However, since Cranbrook station became operational, the hourly service previously enjoyed has been reduced to a two hourly service, at best.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The impact on the village has not been assessed. The School is at capacity, and were it not for the trustees of the Victory Hall allowing their premises to be used for lunches, lessons and other activities, it wouldn't be able to function. The availability of train travel is often stated. However, since Cranbrook station became operational, the hourly service previously enjoyed has been reduced to a two hourly service, at best. There is no viable bus service in the village.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Co-operate with whom? What duty? Who has mandated this? This format is completely unfriendly to lay people who are trying to make comments

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

Jenny Love

Full name: Jenny Love

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

Policy SD29: Strategic Allocations for Whimble Site WHIM 08a I have tried to submit my response via the portal but found it very difficult to navigate, the language impossible to understand and therefore only suitable for legal professionals to use. It is not 'user friendly' for the general public, is quite discriminatory and results in fewer responses being made. No response being taken as affirmative! Not being legally trained, I do not fully understand the term LEGALLY COMPLIANT or what is needed to make the proposal compliant. Or what is needed to make it SOUND. I am therefore making my response by email! My response to the proposal. On October 1st 2024, the EDDC Strategic Planning Committee rejected the site following advice given by professional PLANNING OFFICERS. WHIM08a was deemed unsuitable due to: INCOMPATIBILITY with the special strategy, LACK OF SAFE PEDESTRIAN ACCESS throughout the village. IMPACT ON RURAL LANDSCAPE & WILDLIFE. FLOOD RISK REQUIRING FURTHER ASSESSMENT and most importantly, the site has GREEN WEDGE STATUS to prevent coalescence with CRANBROOK. The site allocation report also considers whether a smaller part could be allocated. The PLANNING OFFICERS view was 'NO'. However, on November 1st 2024, the District Councillor, Todd Olive, suddenly reversed the decision. This was against the original evidence and without any further investigation/assessment, discussion or justification. Making this decision UNSOUND and raising concern. I question the SOUNDNESS of the proposal for the reasons below and oppose the proposal to develop WHIM 08a. The EDDC Site Allocation Report for Whimble states that development should reflect local needs. The Whimble Parish Housing Needs Report states 'The survey identified a need for 4 affordable homes within the next 5 years! Whim 08 is considered to be excessively high in relation to the rest of the village. A total of 83 homes (Whim 08a and Whim11) is not a small development! This is way too many for a small village which has already seen substantial development. Smaller developments that 'blend in' with existing homes/architecture are more appealing and reflect the rural community. The Parish Council suggests the allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01.

Cranbrook is delivering thousands of new homes in the area. There is capacity for more homes to the North of this settlement with direct access to schools, shops and railway station. The current Cobdens Expansion is set to deliver 1500 homes, a school and a Travellers site. THIS SITE IS WITHIN THE WHIMPLE PARISH. Whimple is providing a sufficient number of homes in a location that will provide the required infrastructure. The infrastructure of the small village of Whimple is already inadequate. New development should be built in a more suitable location, along with the required infrastructure and easy access to existing facilities. Whimple School is already full to capacity, relying on the daily use of The Victory Hall to provide the necessary education and well being of the pupils. This means that the rest of the local community are not able use the hall's facilities. New homes bring children with them! Through traffic has increased considerably over the past 20 years. Delivering and collecting children to and from school is dangerous and difficult. There is no availability to park safely! Bottlenecks occur frequently. More homes bring more cars into the area at least two per home! Pavements through the village are non-existent and traffic speeds through the narrow lanes at dangerous levels. The road out of Whimple near WHIM 08a, does not have a pavement for residents who need to walk to the Hand and Pen to catch a bus into Exeter. The lane twists and turns making it dangerous for pedestrians. Whimple is an agricultural village. Traffic includes large farm vehicles moving between farms. Home delivery vehicles have also added to the congestion and high numbers. Although there is currently a small shop, this is now for sale and Whimple stands to lose this amenity. The Surgery is an off shoot of the Coleridge Medical Centre in Ottery St Mary, and therefore caters for patients in the wider community. The train service has declined considerably since the station at Cranbrook opened. Many trains ceased stopping at Whimple- there is only one line and speed is lost if a train stops. Putting the schedule out! The public bus service through the village is very infrequent and not sufficient for people working in Exeter ,as the bus travels through narrow lanes, small villages and on to Sidmouth. Village residents are forced to use their own vehicles which are bad ecologically and environmentally. Being dangerous for pedestrians and cyclists. WHIM 08a is surrounded by beautiful fields, hedgerows, orchards and woodland, which provide a wide range of habitat for wildlife, including bats and owls. We are constantly being told that the natural world is fundamental to our health and wellbeing. I feel that none of these things are taken into account and quick decisions are short sighted. WHIM 08a is prime agricultural land and is currently used as such. As well as having GREEN WEDGE STATUS preventing coalescence between Whimple and Cranbrook. Development would have a detrimental visual impact upon entering the village, increase light and noise pollution and have a great impact on the immediate surroundings. Flooding and sewerage is also a concern. Drainage trenches and pipes have recently been laid by the farmer to alleviate flooding issues. Investigations and

assessments by the planners have been lacking. All of the above points challenge the SOUNDNESS of the proposal. I believe the proposal to develop WHIM08a, has been put forward without careful consideration, lack of transparency, and lack of co-operation and communication with the residents of Whimple.

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

Webarchive.nationalarchives.gov.uk PLANMAKING No 16 C) Plans should be shaped early, be proportionate and have effective engagement between PLANMAKERS and COMMUNITIES, LOCAL ORGANISATIONS, BUSINESSES, INFRASTRUCTURE PROVIDERS and OPERATORS and STRATEGIC CONSULTEES. E) Be accessible through use of digital tools to assist public involvement of policy presentation. EXAMINING PLANS A) Does it address the areas assessed needs? B) Is it justified by having looked at reasonable alternatives?

There has been insufficient information about this proposal. Many residents appear to be unaware of it. Especially those who do not use the latest technology for communication,

Site WHIM 11 33 homes on this site is above the number quoted in the needs report for Whimple. This being 4! All of the reasons stated for opposition to development of WHIM 8a are also applicable to WHIM 11. These developments would have a detrimental impact on the village and all who live here.

Raymond Lovett

Full name: Raymond Lovett

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The large number of houses built this close to the Pebble Bed Heath protected site would lead to an increase of wandering domestic pets and hence the loss of ground nesting birds and small rodents. I have spent nearly 25 years volunteering with the RSPB to keep the area wildlife friendly.

Lucinda

Full name: Lucinda

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

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

Full name: Lucinda

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to policy OL01. The development would be in conflict with the Strategic Nature Area 368, fragmented and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Development of Exmo_02 on heavy clay substitute with ineffective soakaway, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7- the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

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

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

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

Polly Luscombe

Full name: Polly Luscombe

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
agree with allocation of Whim_11. 30 homes in this location seems proportion to the village needs and growth provided that the site is designed sensitively to protect the irreplaceable and important habitats it supports.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Land west of Bramley Gardens Whim 08a should not be allocated for 50 homes. An additional 50 homes beyond the 30 at Whim_11 is disproportionate and unnecessary in the context of Whimble's housing requirements. The site is located within the allocated green wedge and should remain undeveloped to protect and maintain Whimble's village status and feel in the context of Cranbrook which is proposed to encroach further east. The site does not provide safe transport/pedestrian links for this number of homes through the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of Whim_08a or significant reduction in number of homes proposed there

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

Gabrielle M Lyne

Full name: Gabrielle M Lyne

Proposal:

5. Development in the Towns and Villages

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

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

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

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

I vigorously object to the plan to build a large number of houses on this area of land my reasons are listed below:-

1. East Devon is an area of outstanding natural beauty, putting an urban spread on these fields will kill the beauty of this land.

2. More importantly the drainage of this area into a brook going through Withycombe will cause more flooding to the area below the new build section. This is a conflict to Policy number:- ARO1B

3. The sewage system in and around Exmouth is already overloaded this will cause more problems with sewage drainage which is already difficult to resolve.

4. There is a huge amount of Wildlife in this area destroying the Hedgerows and fields is in conflict with Policy OL01 & 13.9

5. The proposed new development is near a unique listed Church and Graveyard which is a perfect area for peace and contemplation which is unusual in this world.
Developing near here will be in conflict with:- Policy HE02

6. The infrastructure needed to support this new development will destroy the surrounding area as the roads are too narrow and winding and take the traveller through small villages. The council says people can walk or bike to areas where there are shops, doctors, etc. They will not as it is far away from the central town of Exmouth up a very long hill consequently people living in this new area will go in their cars causing more congestion on the surrounding roads.

9. Another suggestion was that residents would use Budleigh Salterton more than Exmouth this will cause huge problems with the infrastructure and facilities there. This is in conflict with Policy OL05

10. If East Devon needs new housing this should be placed in a circle around the Axminster and Honiton or the airport area where roads and communication infrastructure is already in existence and large enough to cope with the increase in population and traffic. The major location of facilities and employment is in Exeter, but road and rail links between Exmouth and Exeter are already over busy. People would drive to the Station in Exmouth and need to park their cars causing more problems.

William Jonathan Claydon Lyne

Full name: William Jonathan Claydon Lyne

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The site should have failed the HELAA test as being within 400 yards of Pebblebed Heaths. It should never have been included to proceed to stage 2. Thus it's inclusion is legally incorrect and is subject to a potential Judicial Review.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXM_20 completely.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site is in conflict with policy SP01. Because of its geography development in Exmouth is limited to a 90 degree arc despite Exmouth being designated a Tier 1 town it is unsuitable for any further development. This site is about 4 miles from the town centre and much closer to neighbouring towns such as Woodbury and Budleigh Salterton which are unable to cope with an influx of almost 1000 houses.

The allocation of EXMO_20 is in conflict with Paragraph 11.6. It qualifies as a "larger" development but most of the site is more than 800m (roughly 10 minutes walk) from any services or community facilities. Thus it is most likely that residents will

drive 2 or more miles (via the B3179) either to neighbouring communities or Exmouth town centre.

Allocation of EXM_20 is contrary to Policy TR01. It is extremely unlikely that residents will prefer to walk or cycle from this location for shopping/work/school as the distances are all well over 1 mile, and hilly.

The site is also thus in conflict with paragraph 11.2 as it will increase traffic and require cars to take longer routes. Because of the proximity of Pebblebed Heaths, no housing would be permitted within 400 metres of the proposed junction with B3179 which will increase yet further the necessary distance travelled. Access from the B3179 further increases the distance to Exmouth Town Centre.

The allocation of Site EXM_20 is also contrary to paragraph 3.34. Although Exmouth is a Tier 1 town it already has severe pressure on its infrastructure and services, such as dentists, doctors' surgeries and schools, notably Exmouth Community College. The sewage system in Exmouth is already at capacity as evidenced by the substantial problems last year which necessitated fleets of sewage lorries further increasing traffic congestion.

Allocation of Site EXM_20 also is against policy TR03 and figure 7 of the Local Plan. Due to the restricted access and its hilly topography, the site will create more traffic on the B3179 between Woodbury and Budleigh Salterton. The local plan notes the congestion is already an issue on Western East Devon and the traffic from this site will all be on rural B Roads notorious for congestion and being substandard.

Lastly, the site is in conflict with paragraph 2.6. It is currently open countryside and this is by no means a "modest development" but is in fact a "comprehensive development scheme" in a rural part of East Devon.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXM_20 as a site allocated for development.

As alternatives consider: a. increased development to tier 2 towns which have a 360 degree of potential areas for development such as Honiton and Axminster, both of which have the benefit of being on or adjacent to A Roads. the A 30 and A 35 respectively. b. Increase development in the West-Exe area or between the M5 and A30 close to Exeter Airport to take advantage of far better road and rail connections .

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan is not in accordance with the PCPA 2004 Section 33A. EXMO_20 was deemed not suitable or achievable at the HELAA stage 2 site sifting stage. It has never been either a preferred or second choice scheme and was therefore omitted from regulation 18 consultations with Devon County Council.

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

Harriet Lyons

Full name: Harriet Lyons

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Angus MacDonald

Full name: Angus MacDonald

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

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

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

Road access through the village is already extremely challenging with narrow slow lanes. Speeding has already been an issue and parking is already another problem. The addition of such a number of new homes will have an adverse effect on the existing community.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Consultation seems to be online nowadays, it is disappointing that there does not seem to be in person consultation being held in person with communities to discuss planning/development proposals. During such a meeting it would be beneficial to ensure the community concerns are captured and issues addressed or mitigations presented by planning team.

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

John Macey

Full name: John Macey

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Why , yet again , the wildlife of Exmouth , is being destroyed . I listed my objections to the development to the end of Dinan way , look where that got . overwhelming evidence of rare wildlife , including at least two species of bat , great crested newt , small birds , too numerous to mention , birds of prey , many small mammals , plus badgers . The overblown back pockets won again . The Aldi site , another blow , and now this . Apart from all that , who's going to live in these 150 places , NOT Exmouth people that's for sure , what chance have young local people got none . Graft , greed and corruption.....little britain today .

Bruce K Maclagan

Full name: Bruce K Maclagan

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

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

This site, Whim_08, was considered by EDDC Strategic Planning Committee on 1st October 2024 and took reports from professional planning officers who recommended that the site was NOT allocated for building. There were a number of sound reasons given, and at a public meeting held in Whimble where Planning Officers were in attendance they strongly denied that the site was a possibility for development. The building of some 50 houses would increase the identified risk of flooding, it is probable the the house owners would have private transport of at least one car per house. Whimble does not have the infrastructure to cope with even more cars entering and leaving Church Road, the main road into and out of the village. There are no suitable footpaths in the village, should those house owners decide to walk anywhere, it's already a dangerous place to walk without yet more traffic. More delivery / service vehicles would be in evidence exacerbating the problem. The site is part of the 'Green Wedge' between Whimble and Cranbrook which has already been ignored by EDDC ! This site is contrary to EDDC Emerging Local Plan Policy HN01.

Please advise me what has changed that has allowed this site to be now considered, apart from your arbitrary decision !

Andrew MacMullen

Full name: Andrew MacMullen

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 would seriously increase car traffic and congestion in conflict with Para. 11.2. It is a long way (several miles) from the key services and facilities in either Exmouth or Budleigh Salterton, contrary to para. 11.6. It is too far and too steep for people to walk or cycle to the facilities ~contrary to Policy TR01.

Access onto the B3179 would substantially increase traffic on a narrow and winding road with difficult/dangerous junctions.

The position of Exmo_20 would cause harm to the famous Pebblebed Heaths (SAC/SPA), is contrary to Policy PB01 of the local plan and contrary to the mitigation strategy.

Exmo_20 would destroy wildlife corridors (Para. 13.23) and the habitats in mature trees and hedgerows contrary to Para. 13.9.

Exmo_20 is on the rainwater catchment area of Withycombe Brook and would increase the flood risk in Withycombe in conflict with Policy AR01B.

Because the main road access of Exmo_20 is closer to Budleigh Salterton than Exmouth, this would place increased strain on the facilities in Budleigh and lead to the

coalescence of Exmouth and Budleigh, which is contrary to Policy OL05 of the local plan.

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

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

Desmond Maddock

Full name: Desmond Maddock

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

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

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid

rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

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

Helen Madell

Full name: Helen Madell

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Why is Exmouth classified as Tier 1. There is a failing infrastructure in Exmouth. There is a poor rail link, branch line, trains cancelled frequently. The A376 and B3179/80 are not suitable for the amount of traffic on them at the moment, and will definitely not cope with the amount of extra housing you are proposing. Accidents frequently occur on B3179 especially at junction of Higher Marley Road and Higher Hulham Road, and more traffic is being channeled onto B3179, from St Johns development (exmo 20) this will increase the probability of more accidents at these junctions. It is ridiculous to propose an exit onto an already overused B road which is not fit for the current amount of traffic using it. This housing goes to within 400m of an important National and European site and it is disgraceful that EDDC, who purport to be protecting our environment would put this area at risk due to extra pollution from cars using a road that runs along the perimeter. The amount of extra footfall onto The Pebblebed Heaths would obviously have an adverse affect on this protected area. This area is much closer to Budleigh Salterton than it is to Exmouth!

Coles Field (Exmo14) This land is encroaching even further up Hulham Road to Pebblebed Heaths and is full of wildlife from adjoining ancient woodland, totally overdeveloped taking away the rural feel of the area.

Littleham (Exmo 17.) This area is in a National Landscape designated area, how can you possibly put so many houses on this site and comply with national planning regulations.

Land off Marley Drive (Exmo 04a) This was a dreadful decision to include this area as it has so many protected/endangered species and habitats on site, ancient woodland and woodpasture, ancient/veteran trees, and ancient parkland which should be registered as a priority habitat. The Lawn area has a very large grouping of ancient/veteran trees which is extremely rare and cannot be replaced or mitigated against. Developing this site would be ignoring so many laws and regulations including para 193 of National Planning Policy Framework. This area has tremendous run off from The Pebblebed Heaths, this runs in a stream under Marley Drive, the stream often overflows flooding the field and further hard landscaping would exacerbate this run off possibly flooding further down into Exmouth and Lympstone. Extra traffic exiting onto Higher Marley Road would have problems joining Dinan Way due to extra traffic generated from development at Littleham and St Johns and would inevitably, along with other traffic trying to avoid gridlock on A376 travel up Higher Marley Road onto B3179, greatly increasing the probability of accidents at the junction. This site is up to the 400m buffer zone to Pebblebed Heaths and provides a green corridor from Pebblebed Heaths to Ancient parkland at The Lawn, the ecology of this site with its natural springs and ponds, ancient trees and woods and pastureland make it unique and it should be protected not destroyed.

Exmouth does not have the infrastructure to support this density of housing, the roads are inadequate, the train service is a poor branch line, the Community College is full, the Doctors are full, Budleigh Salterton and Woodbury GP surgeries not accepting any new patients from Exmouth. Building surgeries still need GPs to provide a service! the Sewage system has failed, the beach closed in the middle of summer and sewage discharges polluting the beach this year. Exmouth cannot cope with the amount of housing you are proposing. I know Government targets need to be fulfilled, but it seems to be an ill thought out plan that seems rushed due to present Government strategy. There are more suitable areas in East Devon that have direct dual carriageway and mainline rail links to Exeter or London, Exmouth is on a peninsula and it is full.

Jessica Magill

Full name: Jessica Magill

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Jonathan Mallard

Full name: Jonathan Mallard

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: 1)

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High street, doctors, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

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

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

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

Gill Mallett

Full name: Gill Mallett

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to comment on the above plan, being a long time resident of Whimble {60 years}, and being situated off Church Road midway between Bramley Gardens and the village square.

Understanding that this plan is still being considered despite originally being rejected, following professional planning officers' advice, and agreeing with their concerns over the incompatibility with the promised green wedge status, bearing in mind the proposal for expanding Cranbrook into whimble boundaries already, the impact to wildlife, to which i can personally attest to sightings of deer, owls and woodpeckers on the land surrounding Bramley Gardens, and the flood risk, my main concern is with the lack of pedestrian access not only to the site itself, but also to the village facilities.

On a daily basis i walk along Church Road in both directions, to the Square and also past Bramley Gardens. Much of this route is single track road with very few, if any short stretches of pavement, all of which necessitate stepping out into traffic, often with very limited visibility. Along the vast majority of this road there is no pavement and in many circumstances i will have to dive into driveways, or flatten myself against hedges or cottage walls in order to allow vehicles to pass safely, particularly in the case of lorries, vans and the bus or when cars are trying to pass one another in narrow stretches. Collecting my grandchild from the preschool , situated in the village hall, and walking her home to my house is particularly hazardous and stressful.

In order to make use of any of the village facilities {the shop, the church, the school or preschool, the village hall, the Doctors surgery, train station or bus stop or even the pub], this is the journey i must make and will be the journey the inhabitants of this proposed development will also have to take.

Obviously it is precarious to say the least and with, no doubt, the addition of yet more vehicles using this narrow stretch of road, the situation can only get worse.

Put simply the village has not the infrastructure to cope with an influx of more inhabitants so close to the heart of the village, be they pedestrians or vehicle users.

Thank you for your time in considering my concerns.

Michael Mallett

Full name: Michael Mallett

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Strategic Policy: SD29: Development allocations at Whimble. Land at Station Road (Whim_11) (Correction: Talaton Road)

Development proposals should deliver a footway extension from the west and tie into the site?

Site 11 Whimble Richard Whiteway Memorial Ground Talaton Road I implore you to reject the recommendation of RWMG as it should already have been removed. This field was subject to a 425 signature petition in 1988 to preserve unchanged as submitted to EDDC. (i.e Open Space which we sadly lack). In fact the ashes of two cricket supporters have been scattered. The field is home to owls, woodpeckers, nesting buzzards and foraging bats. There are a TPOs on several trees including those against the Talaton Road. The road is only 4.5 metres wide forcing cars into drive ways and viability is dire. It appears that it is intended to take part of my garden for a footpath which is not negotiable and I have never even been extended the courtesy of being consulted. The area has been granted “Land of Local Landscape Importance” by EDDC. Also I have correspondence from EDDC stating “Permission will not be granted for development on these areas except for recreational uses which retain the open character of the area”. Where are an estimated 50 extra cars going to be parked? Dangers of increased vehicles passing the primary school, the square and Church Road should be seriously considered. Exiting Station Road is already an accident waiting to happen without approximately 100 additional vehicle passing movements. Devon County Council refused an application for access by occasional LPG vehicles on highway grounds.

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

(Letter 19 June 1995 attached) Flooding to The Green and then Clyst Honiton and Clyst St Mary should be considered. Whimple already suffers from sewage overflows without additional housing. Please see attached letters. The Richard Whiteway Memorial Ground (Slewton) must be declared as Open Space to be enjoyed by all.

Eleonora manca

Full name: Eleonora manca

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo-20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook on heavy clay which makes soakways ineffective- it would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe - This is in conflict with POLICY AR01 B Also development Exmo-20 would fragment and isolate habitats and destroy wildlife corridors, contrary to paragraph 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo20 from the local plan

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

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

Mrs Janet S Manfield

Full name: Mrs Janet S Manfield

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I would like to register my strong objection to the above on the following grounds -

? The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

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

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

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

POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

Peter Manfield

Full name: Peter Manfield

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

from the local plan It was originally rejected by the officers at EDDC. And EXMO_17 is going to have a huge impact on the area already.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a Budleigh Salterton Councillor

Full name: Mrs Janet S Manfield

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Lack of co-operation with Budleigh Salterton Town Council

Mrs. Wendy M March

Full name: Mrs. Wendy M March

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo_20 The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth making Budleigh it's most convenient and accessible town. The services and infrastructure of would (High St, Doctors, School, Beach etc.) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan. Would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wilderness and dark skies", which is contrary to POLICY OL01.

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

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

Clare Marlow

Full name: Clare Marlow

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

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

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

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment

area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying

land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key

services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is

contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

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

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

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

Sally Marshall

Full name: Sally Marshall

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am upset to see that land opposite Axeview Drive in Seaton is still on the list for development. A year ago myself and other local people spoke out about this proposal at a town council meeting. I would like to ask you if any of our objections have been taken into account?

1. Flooding. When it rains heavily the water comes down from the field and through the hedge in a waterfall and runs down the road like a river.. It pools up in our house entrances.

Both my self at 21 and my neighbours at 23 have had our entrances relocated to the middle of the house as a preventative measure.

If the field and the trees are not there to soak up the water then where can it go?? The answer is into our homes.

I have spoken to the farmer who currently rents the field and he explained that there is also a natural spring on the hedge line that also over flows during heavy rain.

Building construction will cause an extreme amount of mud, debris and extra water to be sent down our road and on to the busier Barnards Hill.

The increased run off from new builds will cause more potential flooding as the water won't have anywhere else to go but down our hill and to the houses along Barnards Hill.

2. The Sewerage system.

The sewerage system for our house is 40 plus years old. Adding an extra 30 plus houses to this is surely not acceptable or safe ?

In 2021 the construction of Rodgers Way caused an overflow of the sewage system that meant that number 17 Axeview Road was so badly damaged by sewage water and waste flowing into their home. It was too much for the system to process. The elderly occupants had to stay in a hotel for many months whilst the damage was repaired.

Mrs Margaret Leppard of Seaton Floodworking Group has actively opposed this proposal on these grounds. The flood threat is real and very frightening.

3. Mental health and wellbeing.

Even the idea of this development is causing extreme stress to residents. I myself am losing sleep and constantly worrying about it. We are a small cul de sac of 23 houses. The top of our road becoming a building site entrance is a horrifying thought. All that noise, dust, mud and constant construction traffic for months and months..

Then afterwards the increased traffic flow of 80 plus cars going up and down our road will turn this quiet street into a busy road.

What are the plans for this. Where is the proposed site entrance? Do you then plan to have full car access through our road or pedestrian only ?

3. The cul de sac ends with a Devon bank. This is surely protected under the Hedgerows protection act 1997. It is full of wildlife and encompasses a veteran ash tree.. I have contacted Devon County Council and the Environment Agency to advise them of this threat. The green wedge contains a number of trees, many oaks, one of which is protected. The government suggests a buffer zone of 15 times the circumference of the trees girth to protect the roots.

4. The Roman villa in Honeyditches field. The field above Axe View is also known as a Roman field. The current farmer had told me that he regularly finds Roman pottery in the field. I have contacted Alice MacLeod of Historic England to advice of this possible planning application.

I would ask the council to please look out for its residents and help them to sleep easy at night by rejecting this proposal.

Thank you for taking the time to read my letter and I look forward to receiving your feedback.

Brian Martin

Full name: Brian Martin

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The EXMO 20 development is adjacent to the National Landscape and the Pebblebed Heaths (SAC/SPA) and will or is more than likely to have a detrimental effect on these valuable national assets. The proposed development is contrary to policy PB01. It would dramatically increase light pollution and noise affecting the peace and tranquility of the nearby wildlife and be detrimental to trees and hedgerows. The flood risk to the lower lying land is in conflict with Policy ARO1B There would be increased car use with additional congestion getting into the town centre and on the nearby minor and the B3176 The infrastructure for sewage disposal is already overwhelmed and not coping. This needs to be redressed before any plan for 700 new homes can be considered in any part of Exmouth.

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

Susan Martineau

Full name: Susan Martineau

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

Road Access and Sewage disposal. Exmouth has sea and river on two sides and the only access is via the A376 to Exeter and B3178 to Budleigh. Both are heavily overused, a minor accident results on long hold-ups and if there were a Major Incident, emergency crews would struggle. Any further increase in the population, most of whom would commute to Exeter, would make a bad situation much worse. The sewage situation has received so much publicity, country wide, that it is unnecessary to say more.

Exmouth's main income is the tourist industry yet many summer days last year the beach was closed due to pollution. Until SW Water updates its water treatment works and increases their capacity, there should be a hold on new developments.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Increasing the road access is not possible but it would be more sensible to increase e.g. Ottery's or

Honiton's share of necessary development as they have 360 degree land around them for building. And why only 170 homes designated for Sidmouth? Installing small scale sewage treatment works should be a sine qua non for getting planning permission.

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

Ali Martineau

Full name: Ali Martineau

Proposal:

5. Development in the Towns and Villages

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

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

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

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

I am writing to register my strong objection to the proposed developments EXMO_20 and EXMO_17. These applications would lead to significant overdevelopment in an area where infrastructure is already struggling to cope. If approved, the impact on Exmouth and surrounding areas would be severe, causing irreparable harm to local infrastructure, traffic congestion, environmental sustainability, and flood risks.

1. Overdevelopment and Insufficient Infrastructure

Exmouth's infrastructure is already under immense pressure, and the proposed 1,100 new homes would only exacerbate this issue. Local services—including healthcare, education, and public amenities—are stretched thin, and no credible plans have been presented to ensure that additional residents can be adequately accommodated. If existing infrastructure cannot support current demand, how can it possibly sustain such a substantial increase?

2. Traffic Congestion and Road Maintenance (Contrary to Paragraph 11.6 & Policy TR01)

The road network in and around Exmouth is already overloaded. Additional traffic from these developments would only worsen congestion, increasing travel times and air pollution. Furthermore, the local council is already failing to maintain the roads adequately. If existing roads are in poor condition now, how can they possibly withstand the additional burden?

The claim that people will walk or cycle to town is unrealistic. The distance and steep terrain make it impractical for most residents, leading to further car dependency. This directly contradicts Policy TR01, which promotes sustainable transport methods.

3. Destruction of Wildlife and Habitats

The environmental impact of these developments cannot be ignored. Previous developments have already caused significant damage by destroying and isolating habitats, leading to further biodiversity loss. Wildlife corridors have been broken up, making it increasingly difficult for species to survive. This continued destruction is completely unsustainable—nature simply cannot cope with yet another large-scale development.

4. Increased Flood Risk (Contrary to Policy ARO1B)

EXMO_20 is located upstream of Exmouth on the primary rainwater catchment area of Withycombe Brook. This area consists of heavy clay subsoil, which makes soakaways ineffective. Any further development will worsen an already identified flood risk, putting existing residents at greater danger of flooding. This proposal is therefore in direct conflict with Policy ARO1B, which aims to mitigate flood risks.

5. Loss of Separation Between Budleigh and Exmouth (Contrary to Policy OL05)

The proposed main access for EXMO_20 is located closer to Budleigh Salterton than to Exmouth, meaning that Budleigh would become the more convenient and accessible town for new residents. This would lead to an unacceptable coalescence of Budleigh and Exmouth, eroding the distinct identity of both towns. This directly contravenes Policy OL05, which seeks to prevent the merging of settlements.

Conclusion

These developments are wholly inappropriate for Exmouth. The lack of supporting infrastructure, the inevitable increase in traffic congestion, the destruction of natural habitats, the heightened flood risk, and the erosion of the separation between Budleigh and Exmouth all make these proposals entirely unacceptable.

I urge the council to reject applications EXMO_20 and EXMO_17 in order to preserve the integrity of our town, protect its environment, and maintain a sustainable future for residents.

I look forward to your response and hope that these concerns will be given the serious consideration they deserve.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please, no more development for Exmouth. I suggest you build a new town north of Exeter. Where there is plenty of space, much better links to Exeter City centre, Motor ways, and national rail services. Many more ways to access shops and facilities, larger hospitals, more schools etc etc....

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

Lorna Mason

Full name: Lorna Mason

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

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

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

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

Full name: Lorna Mason

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The methodology for identifying and selected housing development sites at Broadclyst has caused real concern and worry for residents. There were 370 unhappy or dissatisfied comments in the initial consultation process regarding site LP Brcl 12 and 246 for LP Brcl 29. For context, for LP Brcl 12 this was five times the number of objections than the next most unpopular site (Whimble 11). LP Brcl 12 had twice the number of objections than even the proposed new town near Clyst Honiton. Despite this, the initial report following the ‘sifting of sites’ process by EDDC, following the public consultation, stated that had been enthusiasm from council officers for development at these sites, and not a single mention that so many objections had been raised by members of the public. EDDC has since faced public criticism for holding closed doors meetings when making their initial site selections. I criticised this part of the process in one of their public meetings and was subsequently berated by the chair of the council. Councillor Rylance told me immediately after my representation that what I had said was “not cool”. We have since complained about her completely unprofessional behaviour. Residents continue to feel that the initial part of the process was lacking in transparency. How can so many people raise concerns and yet officers of the council can be “enthusiastic” about development about these very same sites? Was the public consultation simply a box ticking exercise for EDDC we wondered? We felt that we were being deliberately ignored. Plans to build almost 124 homes on the combined sites at LP_Brcl_29 and LP_Brcl_12 represents significant over-development of the village. We feel that without substantial mitigation, which might not actually be possible in many instances, these sites cannot contribute to sustainability. Inadequate pavements, high quality agricultural land, heritage concerns, single track roads, insufficient highway capacity, oversubscribed doctors and schools, flooding- all of these concerns have been raised about the sites in Broadclyst, and these very same factors were cited as reasons for EDDC rejecting development at other sites. This made no sense to residents in Broadclyst. The initial EDDC summary assessment made no mention of overhead

power lines, or the existing severe traffic bottle necks at either end of our village onto the B3181, waterlogged roads in winter that are impassable or a GP surgery that cannot expand its current premises. I have witnessed raw sewage overspill onto the fields at Heath cross pumping station which is adjacent to these sites. I have photographic evidence of this. I also understand that there is no plan to upgrade the existing Victorian sewage infrastructure. When I questioned one of the engineers from Southwest water about the prospect of 124 new houses, when he was dealing with the latest one, his comment to me was “The pipes will never cope – it would need a serious amount of new infrastructure.” Residents in Town End in Broadclyst have seen flash floods in recent years, and this too is adjacent to Broadclyst 29. I have video footage of surface water gushing into our property and flooding it. This is a huge concern for us if development at this scale goes ahead. We recognise that Broadclyst is a particularly attractive village when considering housing development but we still dispute that the scale of what is being proposed meets The National Planning Framework requirement for delivering sustainable development.

The below supporting text, together with images, provides evidence of the severe congestion regarding traffic and lack of footpaths. In our opinion, the volume of traffic generated by the sites cannot be accommodated on the local highway network without detriment to road safety. There are two access points from the B3181 into Broadclyst village. To the west of the village, it is single track country lanes which access the village, and the latter is the proposed sites for development. In our opinion, there is no sustainable access because there are no formal footpaths. Maintaining Supply and Delivery Broadclyst is also on the edge of the electricity supply network for the area. With the new planning laws requiring low carbon heating and provision of EV charging, the required electricity demand for a development of this size is unlikely to be readily available in such a rural location and the distribution network would need significant reinforcement to be able to meet the needs of the development. There are also overhead power cables in the Southern section of LP_Brcl_12. Supporting a prosperous rural economy Broadclyst itself is surrounded by country roads, many of which are single track in places and often waterlogged or impassable in Winter. We think it is essential that pedestrian access to both schools is significantly improved although we are worried that in some places, there is no room for pavements. At present there is a lack of pavements connecting LP_Brcl_29 and LP_Brcl_12 to both of the schools and the bus stop, and similarly there is insufficient pedestrian access connecting LP_Brcl_09 to Clyst Vale College and the bus stop. Unless people feel safe walking to school or to catch the bus, it's far more likely that they will drive. This is currently what is happening already with many of the children who attend the schools, even when parents live within the village itself. In the most recent edition of our Parish magazine, there was an article about PC Tim Walsh's visit to Town Hill to observe traffic around the Primary school and

understand the challenges presented by “a very busy primary school run”. It also states that he has written a report outlining his concerns to DCC’s Highways Department and asking for a site meeting. School collection times result in congestion because the local roads were never designed to cope with current traffic volumes. Again, some of the roads going towards the schools are single track, for example the country lane between Town End leading to Burrow Road. The existing lanes often flood in Winter and many are very badly rutted. Adding more cars will make this situation much worse and will not contribute to building a more sustainable community. Improvements to the roads to help cyclists must happen if development is to be sustainable. There are no cycle lanes in the village itself to the main commuter routes to Exeter, and no cycle lane provision on Station Road whatsoever. As mentioned, many of the current lanes are single track, so there is already a conflict between cyclists and cars. There is a joint cycle lane/pedestrian pavement on the B3181 between Broadclyst and Exeter but it is poorly maintained and often so overgrown it forces cyclists onto the main road whenever they encounter branches or people walking.

Sustainable Development in Rural Areas One of the biggest concerns of residents is that increasing the size of the village will put intolerable pressure on already struggling local services. We feel that development on this scale, far from enhancing the vitality of our community, is likely to be detrimental. Without remedial action, a swell in population will be especially difficult for the local primary and secondary schools, and the GP surgery. We believe it’s critical to engage both schools in discussion around their capacity issues and have a plan for where the extra children will go prior to approving the proposed development sites. What assurances can we be given that the local surgery will receive the funding it needs to accommodate all the extra patients in Broadclyst village and that developers will engage appropriately with what needs to be delivered?

Flood risk Many residents are concerned that part of site LP_Brcl_12 is in a flood risk zone. During periods of very heavy rain, water saturates these fields making them particularly boggy underfoot. In line with sections 159 and 160 of The National Planning Policy Framework we would like to see an assessment of whether the run-off from surface water, if this site were developed, could potentially increase flood risk of neighbouring properties in Town End and on roads leading up to Burrow Farm. These properties are already prone to flooding and residents are worried that development at this site will make their situation worse. In Autumn 2023 a flash flood caused the length of Town End to be flooded with water entering properties. Development adjacent to this road is bound to make this phenomenon more common in future. Achieving well-designed places Broadclyst is a beautiful village, surrounded by National Trust Land. We are concerned that development on this scale could be detrimental to the intrinsic character of the village, particularly the historic Eastern side of Broadclyst, abutting the proposed sites. This part of the village has many listed and thatched buildings. In

particular, with reference to site LP_Brcl_29, any development here would have a direct impact on Lake House which is Grade 2 Listed. The land proposed is also on an elevation that could dominate the surrounding environment. If development is allowed to go ahead, we suggest it must be in keeping with the historic setting and adhere strictly to the design codes set out in The Parish Neighbourhood Plan. Habitats and Biodiversity In line with National Planning Policy Statement 180, we believe that any residential development in the countryside often has a harmful impact on biodiversity. Residents are concerned that development at sites LP_Brcl_29 and LP_Brcl_12 would be on grade 1 agricultural land. Also on sites LP_Brcl_29 and LP_Brcl_12 there are a number of red and amber listed bird species, some specific to farmland habitat such as skylark and linnet. Bats also use the hedgerows to navigate and the dark skies as cover from predators. Any development at these sites will be detrimental to these species by removing specific habitat, removing their navigation method and increasing the ambient light.

There is a pond on site LP_Brcl_12, the loss of which would be detrimental to wildlife. We would like to see this feature maintained. One of the nearby cottages is a designated site for Great Crested Newts. In the Cylst Vale Regional Park consultation document there was specific mention of the Winter Gardens site (LP_Brcl_12) as being an important habitat for invertebrates. We therefore would like to see a full environmental and biodiversity impact assessment, commissioned prior to development being agreed, and a proper plan for mitigation if development is allowed to go ahead. There are a number of significant habitats near the proposed sites including Ashclyst Forest and Elbury Farm, the first is nationally important for butterflies and the second for rare fungi and Barn Owls. We also feel that given the numbers of bats that have been seen in the Town End area, a survey focussing on this species in particular would be beneficial. In 2023, Land Vale Alliance instructed Grassroots Planning (a private consultancy firm) to provide an opinion on whether an "Environmental Impact Assessment" was necessary ahead of LP_Brcl_12 going to the planning application stage. They came to the conclusion that no such assessment was necessary. We wonder how such an opinion can ever be considered to be unbiased, when its the company that stands to cash in, instructing and paying the fee for another firm to conduct such an assessment? They made the following points which we completely disagree with;

- no highway safety issues
- sufficient capacity to accommodate extra traffic
- good provision of walking and cycling routes to and from the site to public transport and schools (not unless they are prepared to put in a pavement and cycle lane

the length of Whimble Road and also acknowledge the local schools are both way over their capacity)

- no anticipated issues with regard to flood risk
- no significant environmental impact on landscape and visual resources Thy went on to comment that "The existing facilities within Broadclyst may experience some increase in usage but this is unlikely to be significant given the scale of the development...and is likely to benefit the local economy through increased use of existing services". They don't live here. We do. We cannot understand how any such statement could be made and they have clearly not consulted with residents about the existing pressures on services and infrastructure .

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

Anna Matthews

Full name: Anna Matthews

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing with regards to the proposals to build on a protected 'area of outstanding natural beauty' (National Landscape) on the eastern edge of Exmouth.

I strongly object to building on the farmland named Exmo_17. Until very recently this land had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no but despite this, EDDC voted to remove that protection.

National Landscape is of equivalent importance to National Parks and should not have large scale building on it. If house building and light industry/employment development on Exmo_17 were allowed, it would take away the beauty that provides physical and mental wellbeing for residents of Exmouth and Budleigh Salterton, particularly Littleham where arguably residents need the closest proximity access to green space. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

The proposal to build industrial/employment units on this beautiful green field site, next to the main road, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

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

well-used and loved cycle and footpath, used by people of all ages for leisure and for safe green travel between Exmouth and Budleigh.

Development here would provide more housing but housing sites appear to be chosen by wealthy landowners offering what land they wish (and of course selling it for considerable gains), rather than the council considering very carefully where it would most like to see housing and targeting development in the most appropriate places. And the proposals for development are the same old housing seen everywhere else - when so many houses are on the market already, how more of the same housing stock resolves the real housing needs of the area is not at all clear to see.

For all these reasons, it is not in the public interest of Exmouth to allow building on Exmo_17. I believe that to destroy this landscape would bring only loss to the residents of the local area. It deprives both present and future generations of enjoyment and wellbeing and does not create benefit

Alan Mauger

Full name: Alan Mauger

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Sheila & Stephen Maycock

Full name: Sheila & Stephen Maycock

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Specifically re section 14 Site selection Sidm_31.

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

1. I live at Windsor Mead, in one of the houses previously built in the 1960's/70s on an adjacent piece of land and appreciate the wide ranging views from my property across the Sidbury/Sidford non coalescence area. Any new building on site 31 would not drastically impact on those views and would afford similar views to newly built properties.

2. If properties were built in keeping with the low rise nature of existing properties this would reduce any impact on the area.

3. I note Highways have yet to be consulted. Burscombe Lane is the most direct route to any new development, which already has extended access to the A 3052 in the form of a triangle to manage access and egress.

4. There is a suggestion that access could also be via Windsor Mead, which makes far less sense driving vehicles on quiet, narrow, residential streets to reach the end of a culdesac with no current way through to the site. The strip of land that would need to be crossed is, I believe, owned by 14 and 13 Windsor Mead.

5. The egress from Windsor Mead onto the A3052 is tricky. High hedges make it difficult to see out, visibility isn't clear as cars and lorries come quickly around the corner from the right & we often have to edge forward then quickly reverse back up the hill to avoid traffic speeding around the corner on the right. Visibility of cars coming from the left up

the hill isn't great either. In order to turn left larger cars are prone to swing out into the opposite lane. There are often cars parked on the roadside at Windsor Mead, near the junction, which causes more problems with cars turning into Windsor Mead. Additional traffic use of Windsor Mead to access 15 new homes would only exacerbate these issues. Additionally the width of Winsor Mead at the junction with the A3052 is inadequate for 2 cars to safely turn in and out of WM together.

6. As a local resident I am aware that drainage from the site is poor. During times of high rainfall there is a large amount of water that finds its way off the field in question, across the garden of 14 Windsor Mead, causing large torrents of water to flood down the road.

Robert Maynard

Full name: Robert Maynard

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(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.:

1. Introduction

I would like to draw your attention to the fact that the Local Plan is not legally compliant or sound because it incorporates specialised language, jargon, terminology, and acronyms that may not be familiar to or understood by those who need to interpret or implement the Local Plan.

2. Background

The Local Plan does not define the specialised and technical language employed within the Local Plan or provide an index for the policies.

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.:

3. Recommendation

To ensure clarity and comprehension of the Local Plan among all stakeholders, it would be advantageous to incorporate the following:

i) “Glossary of Terms”

This should provide authoritative definitions of the specialised language, jargon, terminology, and acronyms used in the Plan.

ii) An Index of Policies

This should provide a clear index to the policies in the Local Plan.

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.:

1. Introduction

I would like to draw your attention to the fact that the Local Plan is not legally compliant or sound because it incorporates specialised language, jargon, terminology, and acronyms that may not be familiar to or understood by those who need to interpret or implement the Local Plan.

2. Background

The Local Plan does not define the specialised and technical language employed within the Local Plan or provide an index for the policies.

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.:

3. Recommendation

To ensure clarity and comprehension of the Local Plan among all stakeholders, it would be advantageous to incorporate the following:

i) “Glossary of Terms”

This should provide authoritative definitions of the specialised language, jargon, terminology, and acronyms used in the Plan.

ii) An Index of Policies

This should provide a clear index to the policies in the Local Plan.

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

Full name: Robert Maynard

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(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.:

1. Introduction

I would like to bring to your attention that the six-week duration of Regulation 19 Consultation provides inadequate time for thorough consideration and feedback from stakeholders and may be: “Legally non-compliant” and “unsound”.

2. Background Information

The Regulation 19 consultation was published on Thursday, 13 February 2025, with a deadline for comment by 9:00 a.m. on Monday, 31 March 2025 (i.e. 6 weeks, 3 days).

This was the first planned phase of the Regulation 19 Consultation for the full local plan, all content, bar selected elements applicable to the development of policy for the new town proposals (a second new town over and above Cranbrook).

According to the East Devon Development Plan Scheme (published Feb 2025), a second phase of the Regulation 19 Consultation is planned for the Spring 2025 through to early summer, specifically on new town matters. (This is due to an ongoing master

planning work for the new town and a cross-local authority transport study not being concluded until Spring 2025.)

EDDC proposes to submit the plan for examination in Autumn 2025.

The Statement of Community Involvement (Adopted January 2021) indicates that a Local Plan and other DPDs require a minimum of 6 weeks for the consultation document stage.

Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires local planning authorities to publish a draft Local Plan for public consultation before submission for examination. While the regulations specify a minimum consultation period of six weeks, they do not mandate a maximum duration. Therefore, local planning authorities have the discretion to extend the consultation period beyond six weeks if they choose.

3. Six-week Regulation 19 consultation not sound

EDDC's first planned Regulation 19 Consultation provides inadequate time for thorough consideration and feedback from stakeholders and may be: "Legally non-compliant" and "unsound" for the following reasons:

1) The consultation period is insufficient for organisations, interest groups, and the public to engage with the intricate details of comprehending and responding to the Local Plan. In accordance with the Gunning 2nd Principles, there must be ample opportunity for consultees to participate in the consultation. For further reference, please visit:

<https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

2) In terms of the length of Regulation 19 Consultation - the District Council had discretion to extend the period beyond six weeks if they chose to do so. If they had extended the length of the consultation to 12 weeks. This would have provided consultees with a more realistic opportunity to comment on the Local Plan.

3) In view of this being the first (of 2) planned Regulation 19 Consultations, the consultation could have been at least 12 weeks (even if it overlapped with the second planned phase of Regulation 19 Consultation).

4) No extra allowance was made for the half-term week during the consultation period.

5) No allowance was made for other EDDC consultations clashing with the consultation, such as the 6-week Consultation on the East Devon National Landscape Management plan 2025–2030 (deadline 18/04/2025).

6) The Regulation 19 Consultation is considerably less than the initial 10-week Local Plan Consultation undertaken between Monday, November 7th, 2022, until Sunday, January 15th, 2023.

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.:

4. Recommendation

As the local plan consultation process appears to be “legally non-compliant” and “unsound,” the District Council should:

1. Delay approving the Regulation 19 Local Plan for submission to the Planning Inspectorate, due to inadequate public consultation (Gunning Principles).
2. Address the identified inadequacies of the consultation issues.
3. Consider withdrawing and revising the plan.
4. Consider starting the plan-making process anew.

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.:

1. Introduction

I would like to bring to your attention that the six-week duration of Regulation 19 Consultation provides inadequate time for thorough consideration and feedback from stakeholders and may be: “Legally non-compliant” and “unsound”.

2. Background Information

The Regulation 19 consultation was published on Thursday, 13 February 2025, with a deadline for comment by 9:00 a.m. on Monday, 31 March 2025 (i.e. 6 weeks, 3 days).

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

This was the first planned phase of the Regulation 19 Consultation for the full local plan, all content, bar selected elements applicable to the development of policy for the new town proposals (a second new town over and above Cranbrook).

According to the East Devon Development Plan Scheme (published Feb 2025), a second phase of the Regulation 19 Consultation is planned for the Spring 2025 through to early summer, specifically on new town matters. (This is due to an ongoing master planning work for the new town and a cross-local authority transport study not being concluded until Spring 2025.)

EDDC proposes to submit the plan for examination in Autumn 2025.

The Statement of Community Involvement (Adopted January 2021) indicates that a Local Plan and other DPDs require a minimum of 6 weeks for the consultation document stage.

Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires local planning authorities to publish a draft Local Plan for public consultation before submission for examination. While the regulations specify a minimum consultation period of six weeks, they do not mandate a maximum duration. Therefore, local planning authorities have the discretion to extend the consultation period beyond six weeks if they choose.

3. Six-week Regulation 19 consultation not sound

EDDC's first planned Regulation 19 Consultation provides inadequate time for thorough consideration and feedback from stakeholders and may be: "Legally non-compliant" and "unsound" for the following reasons:

1) The consultation period is insufficient for organisations, interest groups, and the public to engage with the intricate details of comprehending and responding to the Local Plan. In accordance with the Gunning 2nd Principles, there must be ample opportunity for consultees to participate in the consultation. For further reference, please visit:

<https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

2) In terms of the length of Regulation 19 Consultation - the District Council had discretion to extend the period beyond six weeks if they chose to do so. If they had extended the length of the consultation to 12 weeks. This would have provided consultees with a more realistic opportunity to comment on the Local Plan.

3) In view of this being the first (of 2) planned Regulation 19 Consultations, the consultation could have been at least 12 weeks (even if it overlapped with the second planned phase of Regulation 19 Consultation).

4) No extra allowance was made for the half-term week during the consultation period.

5) No allowance was made for other EDDC consultations clashing with the consultation, such as the 6-week Consultation on the East Devon National Landscape Management plan 2025–2030 (deadline 18/04/2025).

6) The Regulation 19 Consultation is considerably less than the initial 10-week Local Plan Consultation undertaken between Monday, November 7th, 2022, until Sunday, January 15th, 2023.

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.:

4. Recommendation

As the local plan consultation process appears to be “legally non-compliant” and “unsound,” the District Council should:

1. Delay approving the Regulation 19 Local Plan for submission to the Planning Inspectorate, due to inadequate public consultation (Gunning Principles).

2. Address the identified inadequacies of the consultation issues.

3. Consider withdrawing and revising the plan.

4. Consider starting the plan-making process anew.

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

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Six-week Regulation 19 consultation fails to provide adequate time for organisations to comply with the duty to cooperate.

EDDC’s first planned Regulation 19 Consultation provides inadequate time for thorough consideration and feedback from stakeholders for the following reasons:

1) The consultation period is insufficient for organisations, interest groups, and the public to engage with the intricate details of comprehending and responding to the Local Plan. In accordance with the Gunning 2nd Principles, there must be ample opportunity for consultees to participate in the consultation. For further reference,

please visit:

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2) In terms of the length of Regulation 19 Consultation - the District Council had discretion to extend the period beyond six weeks if they chose to do so. If they had extended the length of the consultation to 12 weeks. This would have provided consultees with a more realistic opportunity to comment on the Local Plan.

3) In view of this being the first (of 2) planned Regulation 19 Consultations, the consultation could have been at least 12 weeks (even if it overlapped with the second planned phase of Regulation 19 Consultation).

4) No extra allowance was made for the half-term week during the consultation period.

5) No allowance was made for other EDDC consultations clashing with the consultation, such as the 6-week Consultation on the East Devon National Landscape Management plan 2025–2030 (deadline 18/04/2025).

6) The Regulation 19 Consultation is considerably less than the initial 10-week Local Plan Consultation undertaken between Monday, November 7th, 2022, until Sunday, January 15th, 2023.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure the issue is considered and provide additional evidence as necessary

Full name: Robert Maynard

Proposal: 12. Our Outstanding Landscape

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 12.11

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

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.:

1. Introduction

I would like to bring to your attention that the Further Draft Local Plan Consultation (16 May/June 2024), particularly with regard to the consultation about the Coastal Preservation Area, was not fit for purpose in terms of the East Devon Local Plan being “legally compliant” and “sound”.

2. Background

In March 2024, the Strategic Planning Committee resolved that the draft Coastal Preservation Area Report be subject to public consultation (Minute 85). (See: East Devon Coastal Preservation Area – technical assessment review <https://eastdevon.gov.uk/media/l4ldnay3/cpa-technical-assessment-review.pdf>)

From 16 May to 27 June 2024, the Further Draft Local Plan Consultation purported to seek public comment about proposed changes to the Coastal Preservation Boundaries.

In early June 2024 (during the Consultation period) EDDC Officers were informed the Consultation Questionnaire:

a) Failed to illustrate the proposed additions or deletions presented in the Background Technical Review,

b) Failed to ask for the public to comment on proposed changes or make other suggestions to the Coastal Preservation Areas in: Area 1 - Lyme Regis to Seaton, Area 2 - Seaton to Sidmouth and Area 3 - Sidmouth to Budleigh.

c) Failed to provide a consistent approach to illustrating the changes or seeking public comment across the whole of the CPA.

EDDC Officer response (dated 5 June 2024) stated:

“The proposed amendments to the CPA, as highlighted in the background technical report, are completely separate to the proposed site allocations within the CPA that we are specifically asking for feedback on (i.e whether or not they should be included within the CPA).

To clarify, we have only asked specific questions on whether or not the site allocations should be in the CPA – not the amendments as proposed in the technical report. Asking specific questions on the ten proposed amendments AND the nine proposed site allocations within the proposed CPA would have made for an overly complex topic ‘tile’ on Commonplace; using the ‘catch all’ question at the end of the topic for comments on the amendments featured in the technical paper was an attempt to make the process of answering questions as simple as possible.”

About 10 June 2024, EDDC some made changes to the mapping illustrations in Commonplace, however the advice to ask specific questions about the 10 proposed amendments was not addressed.

The Feedback Report on the draft East Devon Local Plan (Regulation 18) Further Consultation (16 May to 27 June 2024) dated October 2024 was presented to the Strategic Planning Committee on 29 October 2024 (see: <https://democracy.eastdevon.gov.uk/documents/s25213/2a.%20Reg%2018%20Further%20Consultation%20feedback%20report%20Summer%202024.pdf>)

3. Coastal Preservation Area Consultation

The Further Draft Local Plan Consultation, with regard to the Coastal Preservation Area, was not fit for purpose in terms of being “legally compliant” and “sound” for the following reasons:

1. The Strategic Planning Committee resolution that the draft Coastal Preservation Area Report be subject to public consultation (Minute 85). The consultation failed to ask specific questions on the amendments proposed in the “Coastal Preservation Area - Technical Assessment Review”.
2. The Consultation Questionnaire on “Commonplace” failed to provide the public with a robust opportunity for the public to comment on the proposed changes to the Coastal Preservation Areas. The ‘catch-all’ question to seek a public response to the proposal in the draft Coastal Preservation Area Report was ineffective in terms of canvassing and quantifying public opinion and informing local plan decisions.
3. The Commonplace platform: a) Is not user-friendly on its own in seeking a diversity of public comment. b) Does not provide the public or Councillors with an opportunity to examine the responses; for example, no attempt is made to group the responses according to the questions or indicate the name of the respondents. d) The

234 email or letter responses have not been summarised/combined with Commonplace comments or made more easily accessible.

4. This consultation was limited to a 6-week period. No extra allowance was made for the half-term week during the consultation. This is considerably less than the initial 10-week Local Plan Consultation undertaken between Monday, November 7th, 2022, and Sunday, January 15th, 2023. In accordance with the Gunning 2nd Principles - there must be sufficient opportunity for consultees to participate in the consultation. See <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

5. The Feedback Report : a) Did not provide an adequate summary of the responses to the proposed changes to Coastal Preservation Area. b) Did not quantify the responses to CPA “Other Comments.” c) Failed to summarise and have regard to the content of email/letter responses. d) Failed to comment on or outline the action to be taken.

Officer comments made in the Feedback Report such as:

“Summary comments on responses received are highlighted in this feedback report but at this stage we do not provide comment on or suggest responses to issues raised.
(Feedback Report, page 2)

“It was considered too challenging and time-consuming to add all the responses received offline into Commonplace.” (Feedback Report, page 6)

These comments provide no confidence that any account has been taken of the issues raised by the public.

5. The lack of officer comment on or suggested responses to issues raised and the failure to add all the responses received offline into “Commonplace” demonstrates that the public comments have not been used to inform decisions on the Local Plan. In accordance with the Gunning 4th Principle - ‘conscientious consideration’ must be given to the consultation responses before a decision is made. Decision-makers should be able to provide evidence that they took consultation responses into account. See <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

The above issues illustrates the consultation about the Coastal Preservation Area is likely to be “legally noncompliant” and “unsound”.

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape 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.:

4. Recommendation

1. Delay approving the Regulation 19 Local Plan for submission to the Planning Inspectorate, due to inadequate public consultation and consideration (Gunning Principles 2 & 4), especially regarding the Coastal Preservation Area (CPA).

2. Undertake a genuine (12-week) public consultation on the Coastal Preservation Areas Technical Assessment Review (to accord with Min 85, 12 March 2024).

3. If no further public consultation is undertaken. Reinstate the CPA changes/designations prior to approving the East Devon Local Plan (Regulation 19) for submission to the Inspectorate.

4. Ensure the Authority assesses the soundness and legal compliance of the Local Plan before publishing it under Regulation 19. (See Section 1 - Procedure Guide for Local Plan Examinations.)

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.:

1. Introduction

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4. This consultation was limited to a 6-week period. No extra allowance was made for the half-term week during the consultation. This is considerably less than the initial 10-week Local Plan Consultation undertaken between Monday, November 7th, 2022, and Sunday, January 15th, 2023. In accordance with the Gunning 2nd Principles - there must be sufficient opportunity for consultees to participate in the consultation. See <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

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The above issues illustrates the consultation about the Coastal Preservation Area is likely to be “legally noncompliant” and “unsound”.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter 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 Landscape chapter sound. It will be 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. Recommendation

1. Delay approving the Regulation 19 Local Plan for submission to the Planning Inspectorate, due to inadequate public consultation and consideration (Gunning Principles 2 & 4), especially regarding the Coastal Preservation Area (CPA).

2. Undertake a genuine (12-week) public consultation on the Coastal Preservation Areas Technical Assessment Review (to accord with Min 85, 12 March 2024).

3. If no further public consultation is undertaken. Reinstate the CPA changes/designations prior to approving the East Devon Local Plan (Regulation 19) for submission to the Inspectorate.

4. Ensure the Authority assesses the soundness and legal compliance of the Local Plan before publishing it under Regulation 19. (See Section 1 - Procedure Guide for Local Plan Examinations.)

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

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Information will be presented in more detail when responding to Strategic Policy OL03: Coastal Preservation Areas

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To provide further evidence if needed.

Full name: Robert Maynard

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.: OL03

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

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.:

Object to omitting land between Fortescue and the A3052 from the Coastal Preservation Area (CPA)

1. Introduction

I would like to draw your attention to the fact that the rationale for excluding the land between Fortescue and the A3052 from the coastal preservation area is: ?a) not legally compliant due to an ineffective consultation and failure to effectively consider it. b) not sound due to an unjustified interpretation of a Landscape Character Area boundary and use of unresolved principles and methodology for defining the undeveloped coast.

2. Background

The Undeveloped Coast and Coastal Preservation Area designation, as set out in the adopted East Devon Local Plan 2013-2031, included land previously identified as Coastal Preservation Area within the Devon Structure Plan. Within this Devon County context, the undeveloped coast was originally defined and protected through Devon Structure Plan 'Coastal Preservation Area' Policy CO5. Originating from 1966 in response to Government advice, the purpose of this designation was to protect the finite resource of undeveloped coastal land.

As part of the new East Devon Local Plan 2020 - 2042, the existing Coast Preservation Area boundaries have been subject to review to ensure they remain relevant. The review methodology and recommendations were set out in the East Devon Coastal Preservation Areas - Technical Assessment Review (Dated May 2024).

With regard to the review of the CPA between Fortescue and the A3052 - the Technical Assessment Review recommended amending the CPA boundary to omit land west of Solders Wood between Fortescue and the A3052, shown in Figure 1.

The Reviews explanation for the recommendation is: “At its western end, CPA Area 2 drops steeply down from the coastal plateau to the Sid Valley through inland LCTs 2A and 3A. From the hamlet of Fortescue these afford views to High Peak and coastal promontories beyond (notably from the descent of Sidmouth footpath 117). North of Fortescue the valley slope assumes a northwesterly aspect and views of the coast are prevented by a combination of landform, vegetation and buildings and coastal character is lost. This is reflected in a change of LCA from the Sidmouth and Lyme Bay Coastal Plateau to the inland East Devon Central Ridge LCA. Despite this the CPA currently extends north from Fortescue to the A3052, which appears to be an anomaly.”

INSERT Figure 1 – Land outlined red recommended for omission from current CPA (blue hatch) (see attachment)

In March 2024, the Strategic Planning Committee resolved that the draft Coastal Preservation Area Report be subject to public consultation (Minute 85).

From 16 May to 27 June 2024, the Further Draft Local Plan Consultation about Coastal Preservation Areas purported to seek public comment about proposed changes to the Coastal Preservation Boundaries.

In October 2024 the Feedback Report on the draft East Devon Local Plan (Regulation 18) Further Consultation, summarised the consultation response. However due to the lack of specific questions about the recommendations in the Technical Assessment

Review, the Feedback Report did not present an account of the responses. This demonstrates the consultation and feedback was not fit for purpose.

In February 2025 the East Devon Local Plan Regulation 19 was published for consultation (13th February to 31st March 2025). The CPA boundary in the Regulation 19 Plan (i.e. omitting the Fortescue to A3052) shows the boundary from the middle of Fortescue (illustrated in Figure 2) (Note - This is not consistent with the boundary illustrated in the East Devon Coastal Preservation Areas - Technical Assessment Review, which show the boundary from the south of Fortescue (illustrated in Figure 1))

INSERT Figure 2 - Coastal Preservation Area boundary - Regulation 19 (see attachment)

3. Objection to the Review and the omission of land from the CPA between Fortescue and A3052.

The reasons for objecting to CPA Technical Assessment Review and the omission of land from the CPA between Fortescue and A3052 are:

a) The Technical Assessment Review was based on ‘unresolved’ principles and methodology set out in the ‘Devon Landscape Policy Group Advice Note No. 3: Principles of defining and maintaining the character of Devon’s Undeveloped Coast (Consultation draft) dated 5 November 2013’. A final version of Advice Note No 3 was

not agreed due to a given the large divergence of comment (Source: According he Devon Landscape Policy Group - Terms of Reference)

It is therefore premature and inappropriate of EDDC to use such methodology until clear principles are established determine the extent of undeveloped coast.

b) The draft Advice Note No 3 does not take account of current: i) National Planning Policy Framework (NPPF - Dec 2024 paragraphs 187 to 191) to protect and enhance the natural environment, including landscapes, biodiversity, and soils etc. or ii) The requirements of the CroW Act Section 85 of the Countryside and Right of Way Act 2000 (CRoW Act) (as amended by the Levelling-up and Regeneration Act2 in December 2023) in any policy-making, decision-making or actions that affect National Landscapes. The statutory duty needs to be considered in tandem with the National Planning Policy Framework (NPPF

c) The explanation in the Technical Assessment Review for deleting the CPA is a questionable interpretation of Landscape Character Areas (LCA's) (last updated in 2011) and Landscape Character Types (LCT's) (described in the East Devon and Blackdown Hills Landscape Character Assessment, Fiona Fyfe Associates 2019).

d) There is no distinct change in the landform, contour direction, or wooded ridge line to the north and south of Fortescue in terms of Landscape Character Types (LCT's) to justify omitting about 30% the visible CPA hillside to the east of Sidmouth.

e) The Technical Assessment does not present evidence of fieldwork, illustrations or photographs, or public opinion to justify the omitting the land from the CPA .

f) The CPA to be omitted - falls within designated National Landscape, part of the area is identified as Heritage Coast area and as a Habitat Zone Buffer. In these areas policies aim to protect, manage, and enhance a nation's natural and cultural landscapes for current and future generations, and are consistent with the purpose of the CPA / undeveloped coast is to protect finite resource of the coast.

g) The area between Fortescue and the A3052 complies with the definition of the CPA in that the area is: i) substantially unaffected by development ii) be generally be visible from cliff top, beach, sea or estuary, iii) forms part of the view from significant lengths of an access road, public footpath or bridleway leading to the coast or from the long-distance coastal South West Coast Footpath.

h) Previous Planning Inspectorate Report into the examination of the East Devon Local Plan - January 2016 concluded there was no need to modify the policy or the CPA boundaries. With regard to the coast the Inspector's Report stated:

Paragraph 100 ".....The principles guiding the definition of the CPA boundaries are that the area should be largely unaffected by development and it should be generally visible from cliff top, beach or estuary or from significant lengths of an access road or right of way leading to the coast. The assessment methodology is set out in detail in the Council's hearing statement which explains that the Exe estuary is included to be consistent with the approach taken by Teignbridge District Council"

Paragraph 101 "The extent and boundaries of the CPA in certain places is challenged. I don't doubt that some land included in the CPA does not conform exactly with the above guidelines. However, I am satisfied that the guidelines and assessment methodology are largely sound and see no need to modify the policy or the CPA boundaries."

k) The CPA between Fortescue and the A3052 that has been in existence for nearly 60 years.

4. Visual Openness and Views

The interpretation of the Landscape Character Area (LCA) boundary to redefine the Coastal Preservation Area (CPA) Boundary should not override the CPA definition of visual openness, primarily undeveloped, with views to and from the sea, etc

In terms of defining the visual openness and the views to and from the sea there are clear views of the Fortescue to A3052 area from the SW Coastal Footpath and Public highway between Peak Hill and Jacob's Ladder Beach illustrated in Photo 1.

INSERT Photo 1 - From Peak Hill toward Fortescue and A3052 (see attachment)

From the A3052 (particularly when travelling by bus) and from the footpath from the A3052 to Fortescue (to the east of Trow Hall)there are vistas of the coast toward Peak Hill and the sea as illustrated in Photo 2

INSERT Photo 2 - View from Trow Hill towards Peak Hill and Coast (see attachment)

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape 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.: Recommendation:

1. Reinstatement of CPA between Fortescue and the A3052 from the Coastal Preservation Area (CPA). This will make the Plan legally compliant - due to unsound East Devon Coastal Preservation Areas - Technical Assessment Review, Public Consultation and Consideration in Feedback Report

INSERT Figure 1 Land outlined red recommended for omission from current CPA (blue hatch) (see attachment)

2. Request that a final version of the “Devon Landscape Policy Group (DLPG) Advice Note 3: Principles of defining and maintaining the character of Devon’s Undeveloped Coast” be agreed by the DLPG. This should help Planning Authorities to establish a consistent policy approach to identifying and maintaining the character of the undeveloped coast.

3. Defer reviewing the CPA boundary until the next review of the Local Plan.

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: Object to omitting land between Fortescue and the A3052 from the Coastal Preservation Area (CPA)

1. Introduction

I would like to draw your attention to the fact that the rationale for excluding the land between Fortescue and the A3052 from the coastal preservation area is: a) not legally compliant due to an ineffective consultation and failure to effectively consider it. b) not sound due to an unjustified interpretation of a Landscape Character Area boundary and use of unresolved principles and methodology for defining the undeveloped coast.

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As part of the new East Devon Local Plan 2020 - 2042, the existing Coast Preservation Area boundaries have been subject to review to ensure they remain relevant. The review methodology and recommendations were set out in the East Devon Coastal Preservation Areas - Technical Assessment Review (Dated May 2024).

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In October 2024 the Feedback Report on the draft East Devon Local Plan (Regulation 18) Further Consultation, summarised the consultation response. However due to the lack of specific questions about the recommendations in the Technical Assessment Review, the Feedback Report did not present an account of the responses. This demonstrates the consultation and feedback was not fit for purpose.

In February 2025 the East Devon Local Plan Regulation 19 was published for consultation (13th February to 31st March 2025). The CPA boundary in the Regulation 19

Plan (i.e. omitting the Fortescue to A3052) shows the boundary from the middle of Fortescue (illustrated in Figure 2) (Note - This is not consistent with the boundary illustrated in the East Devon Coastal Preservation Areas - Technical Assessment Review , which show the boundary from the south of Fortescue (illustrated in Figure 1))

INSERT Figure 2 - Coastal Preservation Area boundary - Regulation 19 (see attachment)

3. Objection to the Review and the omission of land from the CPA between Fortescue and A3052.

The reasons for objecting to CPA Technical Assessment Review and the omission of land from the CPA between Fortescue and A3052 are:

a) The Technical Assessment Review was based on ‘unresolved’ principles and methodology set out in the ‘Devon Landscape Policy Group Advice Note No. 3: Principles of defining and maintaining the character of Devon’s Undeveloped Coast (Consultation draft) dated 5 November 2013’. A final version of Advice Note No 3 was not agreed due to a given the large divergence of comment (Source: According he Devon Landscape Policy Group - Terms of Reference)

It is therefore premature and inappropriate of EDDC to use such methodology until clear principles are established determine the extent of undeveloped coast.

b) The draft Advice Note No 3 does not take account of current: i) National Planning Policy Framework (NPPF - Dec 2024 paragraphs 187 to 191) to protect and enhance the natural environment, including landscapes, biodiversity, and soils etc. or ii) The requirements of the CroW Act Section 85 of the Countryside and Right of Way Act 2000 (CRoW Act) (as amended by the Levelling-up and Regeneration Act² in December 2023) in any policy-making, decision-making or actions that affect National Landscapes. The statutory duty needs to be considered in tandem with the National Planning Policy Framework (NPPF

c) The explanation in the Technical Assessment Review for deleting the CPA is a questionable interpretation of Landscape Character Areas (LCA's) (last updated in 2011) and Landscape Character Types (LCT's) (described in the East Devon and Blackdown Hills Landscape Character Assessment, Fiona Fyfe Associates 2019).

d) There is no distinct change in the landform, contour direction, or wooded ridge line to the north and south of Fortescue in terms of Landscape Character Types (LCT's) to justify omitting about 30% the visible CPA hillside to the east of Sidmouth.

e) The Technical Assessment does not present evidence of fieldwork, illustrations or photographs, or public opinion to justify the omitting the land from the CPA .

f) The CPA to be omitted - falls within designated National Landscape, part of the area is identified as Heritage Coast area and as a Habitat Zone Buffer. In these areas policies aim to protect, manage, and enhance a nation's natural and cultural landscapes for current and future generations, and are consistent with the purpose of the CPA / undeveloped coast is to protect finite resource of the coast.

g) The area between Fortescue and the A3052 complies with the definition of the CPA in that the area is: i) substantially unaffected by development ii) be generally be visible from cliff top, beach, sea or estuary, iii) forms part of the view from significant lengths of an access road, public footpath or bridleway leading to the coast or from the long-distance coastal South West Coast Footpath.

h) Previous Planning Inspectorate Report into the examination of the East Devon Local Plan - January 2016 concluded there was no need to modify the policy or the CPA boundaries. With regard to the coast the Inspector's Report stated:

Paragraph 100 ".....The principles guiding the definition of the CPA boundaries are that the area should be largely unaffected by development and it should be generally visible from cliff top, beach or estuary or from significant lengths of an access road or right of way leading to the coast. The assessment methodology is set out in detail in the Council's hearing statement which explains that the Exe estuary is included to be consistent with the approach taken by Teignbridge District Council"

Paragraph 101 "The extent and boundaries of the CPA in certain places is challenged. I don't doubt that some land included in the CPA does not conform exactly with the above guidelines. However, I am satisfied that the guidelines and assessment methodology are largely sound and see no need to modify the policy or the CPA boundaries."

k) The CPA between Fortescue and the A3052 that has been in existence for nearly 60 years.

4. Visual Openness and Views

The interpretation of the Landscape Character Area (LCA) boundary to redefine the Coastal Preservation Area (CPA) Boundary should not override the CPA definition of visual openness, primarily undeveloped, with views to and from the sea, etc

In terms of defining the visual openness and the views to and from the sea there are clear views of the Fortescue to A3052 area from the SW Coastal Footpath and Public highway between Peak Hill and Jacob's Ladder Beach illustrated in Photo 1.

INSERT Photo 1 - From Peak Hill toward Fortescue and A3052 (see attachment)

From the A3052 (particularly when travelling by bus) and from the footpath from the A3052 to Fortescue (to the east of Trow Hall)there are vistas of the coast toward Peak Hill and the sea as illustrated in Photo 2

INSERT Photo 2 - View from Trow Hill towards Peak Hill and Coast (see attachment)

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter 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 Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Recommendation

1. Reinstatement of omitted CPA between Fortescue and the A3052 from the Coastal Preservation Area (CPA) This will make the Plan legally compliant - due to unsound East Devon Coastal Preservation Areas - Technical Assessment Review, Public Consultation and Consideration in Feedback Report..

INSERT Figure 1 Land outlined red recommended for omission from current CPA (blue hatch) (see attachment)

2. Request that a final version of the “Devon Landscape Policy Group (DLPG) Advice Note 3: Principles of defining and maintaining the character of Devon’s Undeveloped Coast” be agreed by the DLPG. This should help Planning Authorities to establish a consistent policy approach to identifying and maintaining the character of the undeveloped coast.

3. Defer reviewing the CPA boundary until the next review of the Local Plan.

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

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This part of the Our Outstanding Landscape chapter does not comply with the duty to cooperate for the following reasons.

1. The Technical Assessment Review was based on ‘unresolved’ principles and methodology set out in the ‘Devon Landscape Policy Group Advice Note No. 3: Principles of defining and maintaining the character of Devon’s Undeveloped Coast (Consultation draft) dated 5 November 2013’. A final version of Advice Note No 3 was not agreed due to a given the large divergence of comment (Source: According he Devon Landscape Policy Group - Terms of Reference)

It is therefore premature and inappropriate of EDDC to use such methodology until clear principles are established determine the extent of undeveloped coast.

2. The draft Advice Note No 3 does not take account of current:

i) National Planning Policy Framework (NPPF - Dec 2024 paragraphs 187 to 191) to protect and enhance the natural environment, including landscapes, biodiversity, and soils etc. or

ii) The requirements of the CroW Act Section 85 of the Countryside and Right of Way Act 2000 (CRoW Act) (as amended by the Levelling-up and Regeneration Act² in December 2023) in any policy-making, decision-making or actions that affect National Landscapes. The statutory duty needs to be considered in tandem with the National Planning Policy Framework (NPPF

3. The explanation in the Technical Assessment Review for deleting the CPA is a questionable interpretation of Landscape Character Areas (LCA’s) (last updated in 2011) and Landscape Character Types (LCT’s) (described in the East Devon and Blackdown Hills Landscape Character Assessment, Fiona Fyfe Associates 2019).

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To assist with any specific issues

Full name: Robert Maynard

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.: OL06

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

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.:

1. Introduction

I would like to bring to your attention that the Byes (in Sidmouth) up to the A3052 has a significant amenity, nature conservation, and recreational value to the town and should continue to be protected for its Local Amenity Importance. The failure to include Policy EN3 - Land at the Byes included in East Devon Local Plan 2013-2031 (adopted on 28 January 2016) or a similar level of protection would:

- i) Undermine the need to protect the area for the population of the area.
- ii) Result in a policy vacuum due to the lack of an up-to-date Neighbourhood Plan.

The failure to protect it for its Local Amenity importance undermines the legal compliance, effectiveness, and soundness of the Local Plan.

2. Background

The East Devon Local Plan 2013-2031 (adopted on 28 January 2016) describes the Byes as:

22.5 The wedge of agricultural land and open space along the valley of the Sid, known as the Byes, has a significant amenity, nature conservation, and recreational value to the town. Within the Built-up Area Boundary land in the Byes is public open space or owned by the National Trust. The agricultural land outside the Built-up Area Boundary should be protected because of its amenity, nature conservation, and recreational value. An Article 4 direction has been made in respect of the Byes so that a specific grant of planning permission is required for agricultural buildings which would normally be erected as permitted development.

22.6 A section of cycle track has been constructed in The Byes between Sid Park Road and Salcombe Road, and the Council proposes the continuation of this route to Sidford.

Policy EN3 - Land at the Byes in Sidmouth

Land at the Byes is designated on the Proposals Map. The only development which will be permitted in this area is that which will not detract from its amenity, nature conservation, and/or recreational value to the town.

Diagram 1: The area of the Byes to be protected (horizontal hatch in red)

3. Land at the Byes - amenity, nature conservation, and recreation value

The Byes has a significant amenity, nature conservation, and recreational value to the town (Sidmouth).

Initiatives such as those at: Seaton Wetlands (Axe Valley) (Seaton - population 7,500), Otter Estuary Nature Restoration Project (Budleigh Salterton - population 6,500) These are examples of initiatives that improve the conservation and recreational value.

A similar type of initiative needs to be developed for Sidmouth in the Sid valley/Byes to meet the current and future needs of Sidmouth (population 13,500). Sidmouth being the second-largest town in East Devon.

It is therefore essential that the Byes continues to be safeguarded for its amenity, nature conservation, and/or recreational value to the town.

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape 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 Regulation 19 Plan needs to designate the Byes on the Policies Map and include a Policy to protect this important amenity, nature conservation, recreation value, and flood plain from inappropriate development.

Diagram 1: The area of the Byes to be protected (horizontal hatch in red)

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.:

1. Introduction

I would like to bring to your attention that the Byes (in Sidmouth) up to the A3052 has a significant amenity, nature conservation, and recreational value to the town and should continue to be protected for its Local Amenity Importance. The failure to include Policy EN3 - Land at the Byes included in East Devon Local Plan 2013-2031 (adopted on 28 January 2016) or a similar level of protection would:

- i) Undermine the need to protect the area for the population of the area.
- ii) Result in a policy vacuum due to the lack of an up-to-date Neighbourhood Plan.

The failure to protect it for its Local Amenity importance undermines the legal compliance, effectiveness, and soundness of the Local Plan.

2. Background

The East Devon Local Plan 2013-2031 (adopted on 28 January 2016) describes the Byes as:

22.5 The wedge of agricultural land and open space along the valley of the Sid, known as the Byes, has a significant amenity, nature conservation, and recreational value to the town. Within the Built-up Area Boundary land in the Byes is public open space or owned by the National Trust. The agricultural land outside the Built-up Area Boundary should be protected because of its amenity, nature conservation, and recreational value. An Article 4 direction has been made in respect of the Byes so that a specific grant of planning permission is required for agricultural buildings which would normally be erected as permitted development.

22.6 A section of cycle track has been constructed in The Byes between Sid Park Road and Salcombe Road, and the Council proposes the continuation of this route to Sidford.

Policy EN3 - Land at the Byes in Sidmouth

Land at the Byes is designated on the Proposals Map. The only development which will be permitted in this area is that which will not detract from its amenity, nature conservation, and/or recreational value to the town.

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The Byes has a significant amenity, nature conservation, and recreational value to the town (Sidmouth).

Initiatives such as those at: Seaton Wetlands (Axe Valley) (Seaton - population 7,500), Otter Estuary Nature Restoration Project (Budleigh Salterton - population 6,500) These are examples of initiatives that improve the conservation and recreational value.

A similar type of initiative needs to be developed for Sidmouth in the Sid valley/Byes to meet the current and future needs of Sidmouth (population 13,500). Sidmouth being the second-largest town in East Devon.

It is therefore essential that the Byes continues to be safeguarded for its amenity, nature conservation, and/or recreational value to the town.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter 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 Landscape chapter sound. It will be 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 Regulation 19 Plan needs to designate the Byes on the Policies Map and include a Policy to protect this important amenity, nature conservation, recreation value, and flood plain from inappropriate development.

Diagram 1: The area of the Byes to be protected (horizontal hatch in red)

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

Full name: Robert Maynard

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.: CC03

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

2(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not legally compliant. Please be as precise as possible. :

1. Introduction

I would like to bring to your attention that Strategic Policy CC03: Promoting low carbon and renewable energy in National Landscape and undeveloped coasts is not legally compliant.

2. Background Information

Strategic Policy CC03: Promoting low carbon and renewable energy states:

“Proposals for low carbon and renewable energy generating and storage schemes within the district will be supported in the context of sustainable development and climate change, provided that:

A. There are no significant adverse impacts on the local environment that cannot be satisfactorily mitigated, including individual and cumulative landscape and visual impacts, as well as the character of wider historic townscapes, landscapes and seascapes; protected species and sites of ecological/geological importance;

B. Any farmland that is used allows for the continuation on the site for some form of appropriate agricultural activity or bio-diversity use proportionate to the scale of the proposal; and

C. Appropriate plans and a mechanism are in place for the removal of the technology on cessation of energy generation/ storage, and restoration of the site to its original use or an acceptable alternative use.

Development located within or affecting the setting of National Landscapes and the undeveloped coast, unless visual and other adverse impacts can be shown to be minimal or nil, will only be permitted where evidence shows that exceptional circumstances exist to justify development. Such development should be, where acceptable, small scale giving due regard to the natural beauty of these areas.

Proposals for wind farms will only be allowed in defined areas as shown on the Policies Map. Domestic and other small-scale wind turbines will be preferred. Planning permission for fossil fuel electricity or other energy generation will only be granted where there is a clear and compelling need for the project that addresses a recognisable system failure, and all viable renewable energy options, including energy storage solutions, must be thoroughly explored and deemed unsuitable for fossil fuels schemes to progress.

This policy applies across the whole local plan area including the Cranbrook Plan area.”

3. Objections

Objection 1: Object to the 5th paragraph of Strategic Policy CCO3: Promoting low-carbon renewable energy generation and storage schemes in National Landscapes and undeveloped coasts is not legally compliant..

Development located within National Landscapes and undeveloped coast/CPA should be determined in accordance with: a) Strategic Policy OL02 - National Landscape to protect the landscape and scenic beauty and b) Strategic Policy OL03 - Coastal Preservation Area to protect the finite undeveloped coast from development.

The wording of Strategic Policy CC03 should be amended.

Objection 2: Object to proposals for wind farms in defined areas, within National Landscapes and Coastal Preservation Areas, shown on the Policies Map. These defined areas do not comply with national policies that prioritise environmental protection. While wind farm proposals are possible, they must demonstrate minimal adverse effects on these sensitive areas to comply with national policy.

Wind farm development located within National Landscapes and undeveloped coast/CPA should be determined in accordance with: a) Strategic Policy OL02 - National Landscape to protect the landscape and scenic beauty and b) Strategic Policy OL03 - Coastal Preservation Area to protect the finite undeveloped coast from development.

The areas defined for wind farms within National Landscapes and Coastal Preservation Areas should be deleted from the Policies Map.

2(c). Please set out the modification(s) you consider necessary to make this part of the Mitigating 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 Mitigating 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.: Recommendation 1:

Promoting proposals for low-carbon and renewable energy generating and storage schemes should be considered in accordance with Strategic Policy CC03 National Landscapes and Strategic Policy OL03 Coastal Preservation Area.

The 5th paragraph in Strategic Policy CC03 should be reworded as follows:

“Low carbon and renewable energy development and wind farms located within or affecting the setting of National Landscapes and the undeveloped coast/Coastal Preservation Area will be determined in accordance with Strategic Policy CC03 National Landscapes and Strategic Policy OL03 Coastal Preservation Area.”

Recommendation 2:

The areas defined for wind farms within National Landscapes and Coastal Preservation Areas should be deleted from the Policies Map.

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.:

1. Introduction

I would like to bring to your attention that Strategic Policy CC03: Promoting low carbon and renewable energy in National Landscape and undeveloped coasts is not sound.

2. Background Information

Strategic Policy CC03: Promoting low carbon and renewable energy states:

“Proposals for low carbon and renewable energy generating and storage schemes within the district will be supported in the context of sustainable development and climate change, provided that:

A. There are no significant adverse impacts on the local environment that cannot be satisfactorily mitigated, including individual and cumulative landscape and visual impacts, as well as the character of wider historic townscapes, landscapes and seascapes; protected species and sites of ecological/geological importance;

B. Any farmland that is used allows for the continuation on the site for some form of appropriate agricultural activity or bio-diversity use proportionate to the scale of the proposal; and

C. Appropriate plans and a mechanism are in place for the removal of the technology on cessation of energy generation/ storage, and restoration of the site to its original use or an acceptable alternative use.

Development located within or affecting the setting of National Landscapes and the undeveloped coast, unless visual and other adverse impacts can be shown to be minimal or nil, will only be permitted where evidence shows that exceptional

circumstances exist to justify development. Such development should be, where acceptable, small scale giving due regard to the natural beauty of these areas.

Proposals for wind farms will only be allowed in defined areas as shown on the Policies Map. Domestic and other small-scale wind turbines will be preferred. Planning permission for fossil fuel electricity or other energy generation will only be granted where there is a clear and compelling need for the project that addresses a recognisable system failure, and all viable renewable energy options, including energy storage solutions, must be thoroughly explored and deemed unsuitable for fossil fuels schemes to progress.

This policy applies across the whole local plan area including the Cranbrook Plan area.”

3. Objections

Objection 1: Object to the 5th paragraph of Strategic Policy CCO3: Promoting low-carbon renewable energy generation and storage schemes in National Landscapes and undeveloped coasts is unsound.

Development located within National Landscapes and undeveloped coast/CPA should be determined in accordance with: a) Strategic Policy OL02 - National Landscape to protect the landscape and scenic beauty and b) Strategic Policy OL03 - Coastal Preservation Area to protect the finite undeveloped coast from development.

The wording of Strategic Policy CC03 should be amended.

Objection 2: Object to proposals for wind farms in defined areas, within National Landscapes and Coastal Preservation Areas, shown on the Policies Map. These defined areas do not comply with national policies that prioritise environmental protection. While wind farm proposals are possible, they must demonstrate minimal adverse effects on these sensitive areas to comply with national policy.

Wind farm development located within National Landscapes and undeveloped coast/CPA should be determined in accordance with: a) Strategic Policy OL02 - National Landscape to protect the landscape and scenic beauty and b) Strategic Policy OL03 - Coastal Preservation Area to protect the finite undeveloped coast from development.

The areas defined for wind farms within National Landscapes and Coastal Preservation Areas should be deleted from the Policies Map.

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.: Recommendation 1:

Promoting proposals for low-carbon and renewable energy generating and storage schemes should be considered in accordance with Strategic Policy CC03 National Landscapes and Strategic Policy OL03 Coastal Preservation Area.

The 5th paragraph in Strategic Policy CC03 should be reworded as follows:

“Low carbon and renewable energy development and wind farms located within or affecting the setting of National Landscapes and the undeveloped coast/Coastal Preservation Area will be determined in accordance with Strategic Policy CC03 National Landscapes and Strategic Policy OL03 Coastal Preservation Area.”

Recommendation 2:

The areas defined for wind farms within National Landscapes and Coastal Preservation Areas should be deleted from the Policies Map.

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

Full name: Robert Maynard

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.: SE11

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.:

1. Introduction

I would like to bring to your attention that Policy SE11: Holiday accommodation parks in designated landscapes is unsound because it fails:

a) to effectively restrict new holiday accommodation parks in East Devon's most sensitive landscapes,

b) to comply with the requirements of NPPF paragraph 187 sub para c) by maintaining the character of the undeveloped coast, while improving public access to it where appropriate.

2. Background Information

The Regulation 19 - Local Plan Policy states:

“Policy SE11: Holiday accommodation parks in designated landscapes

Within the District’s most sensitive landscape areas, including National Landscapes, Coastal Preservation Areas and Green Wedges, new caravan, chalet or other holiday parks will not be permitted.

Proposals for the extension of, or related and ancillary facilities on, existing sites will be permitted provided they meet the following criteria in full:

- A. No additional permanent pitches or accommodation are to be provided, although upgraded accommodation of a similar size and height will be allowed on the footprint of existing permanent accommodation where this will result in an environmental improvement;
- B. The proposal relates sensitively in scale and siting to the surroundings and includes extensive landscaping and visual screening to mitigate against adverse impacts;
- C. The proposal would not have an adverse impact on local character or the amenities of adjoining residents;
- D. The proposal would not use the best and most versatile agricultural land;
- E. The proposal will be provided with adequate services and utilities;
- F. Traffic generated by the proposal can be accommodated safely on the local highway network and safe highway access to the site can be achieved;
- G. The proposal will be subject to the provisions of plan policy in terms of sustainable construction, on site renewable energy production and biodiversity net gain; and

H. Any structures beyond the existing boundary of the site are temporary and any visual or other harm can be satisfactorily mitigated.

This policy does not apply in the Cranbrook Plan area.”

3. Policy SE11 should be amended to ensure it is effective and consistent with National Policy

Not permitting new caravan, chalet or other holiday parks or proposals for extensions of existing sites in National Landscapes (AONB), Coastal Preservation Areas and Green Wedges to protect the most sensitive landscapes is consistent with:

a) NPPF policy that give “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes” (Paragraph 189).

b) CroW Act Duty to protect

c) Objective 8 of the Local Plan “To protect and enhance our outstanding natural environment and support an increase in biodiversity.” (Objective 8)

Policy SE11 should be amended to ensure it is effective and consistent with National Policy to maintaining the character of the undeveloped coast

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.:

4. Recommendation

The Policy SE11 be amended as follows

Policy SE11: Holiday accommodation parks in designated landscapes

Within the District’s most sensitive landscape areas, including National Landscapes, Coastal Preservation Areas and Green Wedges, new caravan, chalet or other holiday parks INSERT “and proposals for the extension of existing sites or the conversion of existing touring caravan sites for such uses” will not be permitted.

Proposals for DELETE “the extension of, or related and” INSERT “upgrading accommodation” and ancillary facilities on, existing sites will be permitted provided they meet the following criteria in full:

A. No additional permanent pitches or accommodation are to be provided, although upgraded accommodation of a similar size and height will be allowed on the footprint of existing permanent accommodation where this will result in an environmental improvement INSERT “(sites with three or more static caravans will be expected to reduce the overall number of units/pitches)”;

INSERT “A+. There is no intensification of use or activity, the existing site area is not extended and the site is retained as a single business unit;”

INSERT “A++ Seasonal holiday restrictions and short stay holiday occupancy conditions will apply to mitigate adverse impacts of light pollution and local amenity. “

B. The proposal relates sensitively in scale and siting to the surroundings and includes extensive landscaping and visual screening to mitigate against adverse impacts;

C. The proposal would not have an adverse impact on local character or the amenities of adjoining residents;

D. The proposal would not use the best and most versatile agricultural land;

E. The proposal will be provided with adequate services and utilities;

F. Traffic generated by the proposal can be accommodated safely on the local highway network and safe highway access to the site can be achieved;

G. The proposal will be subject to the provisions of plan policy in terms of sustainable construction, on site renewable energy production and biodiversity net gain; and

DELETE “H. Any structures beyond the existing boundary of the site are temporary and any visual or other harm can be satisfactorily mitigated.”

This policy does not apply in the Cranbrook Plan area.

INSERT NEW POLICY

“New Policy SE??

Permissions for campsites and touring caravan sites will be subject to conditions requiring that:

a. Tents, motorhomes, and caravans are restricted to short-stay holiday occupancy only; and

b. no tent or caravan occupies any pitch for more than 28 days.”

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate 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 Policy protects and enhances our outstanding natural environment

Bill McDermott

Full name: Bill McDermott

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed plan will have significant and detrimental effects on the local infrastructure and natural habitat and at a time when there are already extreme pressures on both. The proposal appears to ignore the communications links and difficulties that already exist for local traffic along the B3179 and would exacerbate traffic issues.

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To show the depth of concern over the plan and to ensure voices are heard.

Katherine Louise McDermott-Darley

Full name: Katherine Louise McDermott-Darley

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal would lead to merged conurbation of Budleigh and Exmouth which is contrary to Policy OL05 of the Local Plan. Geographically and taking into account the minor road infrastructure, the main access point of Exmo_20 is closer to Budleigh Salterton than Exmouth. The already over-stretched local services and infrastructure would be the closest and preferred choice for residents and create an overburdened of demand on for example, the Doctor's surgery, underfunded primary school, public toilets, sewage systems, aggravated in the holiday season by incomers.

An alternative location for housing allocation should be selected, one which is available, sustainable and suitable in the HELAA. The harm to the Pebblebed Heaths and rare and protected habitats is contrary to Policy PB01 of the local plan. Exmo_20b would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II listed church and churchyard, drastically altering the attractive rural environment for worship and spiritual retreat. This is contrary to Policy HE02. Flood risk and fire hazards would be increased. The soak away system is already inadequate in current climate conditions with increased rainfall and intermittent drought. The impact on car pollution, congestion and accidents to pedestrians, walkers and cyclist would undermine the recreational attraction of this outstanding beautiful natural landscape. Increased traffic congestion would inevitably ensure contrary to Policy TR01.

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

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and ensure that traffic volumes along the B3179 and not increased.

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

Vanessa McGlade

Full name: Vanessa McGlade

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This proposed development must be located elsewhere. It will cause significant impact to the Pebblebed Heaths it is wholly in contravention to Policy PB01 and not in accordance with mitigation strategies

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This would destroy the wild area, tranquilly and dark skies of the area and countryside . And totally contravenes Policy OL01

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This would destroy the wild area, tranquilly and dark skies of the area and countryside . And totally contravenes Policy OL01

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

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo20 from the local plan

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

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

Alison McLaren

Full name: Alison McLaren

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of EXMO_20 is significantly closer to Budleigh Salterton than to Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, Beach, etc) would be the preferred choice of residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

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

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

Exmo_20 would have a detrimental effect of this open countryside site and the adjacent internationally designated wildlife sites, elimination the 'tranquillity, wildness and dark skies', which is contrary to POLICY OL01.

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

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

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR018.

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

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

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

Paul Mcloughlin

Full name: Paul Mcloughlin

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Don't really understand the question but my comments below, on the proposed development may indicate an answer.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Re Land adjoining Mill Lane Exton. (Wood 01 & Wood 028). This land is a flood plane for higher land containing housing & farms. Mill Lane often floods at its lower levels. Mill Lane is a single track road with only one passing place (which is not maintained & is often used for parking of vans delivering or belonging to contractors). There is no pedestrian foot path. I live in a property off Mill Lane & I often have to reverse into peoples drives to allow other vehicles to pass.

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

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

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

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

Greatly reduce the number of proposed properties . Mill lane would need to be widened to two lanes or additional passing places added, plus a foot path for pedestrian safety. No idea what can be done about flooding as this sometimes also comes from an overflowing stream.

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

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

Sue Mcloughlin

Full name: Sue Mcloughlin

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

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

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Firstly I live at Oaklands. The land to the west I have no problem with as long as a footpath is included which will make crossing the road easier. The A376 is becoming a very dangerous road to cross . I have seen a big increase in traffic in the 14 years I have lived here. With all the new houses being built along Dinah Way in Exmouth the A376 will probably have to cope with more traffic. Can I please ask that the buildings are not too close to the boundary to respect our privacy.

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Not specifically opposed to this development but I am very concerned about the flooding aspect. I recently had a problem after a very heavy downpour. Mill Lane is very narrow with sharp bends & no passing places or pavement. We also enjoy a variety of local wildlife which should be considered with any new development

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

extended to Woodbury along Mill Lane there is a problem with cyclists exiting the path from Woodbury at high speed without checking Mill Lane. Maybe a stop sign & lines would help this situation.

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

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

Please refer to answers given previously

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

Please refer to previous answers.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It would be good if the train could stop at Exton Station every 30 minutes without it being requested.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exton is an area where the housing is quite expensive & therefore I suspect none of this development will be suitable for social housing. The council will still need to fulfil this need to comply with the duty to co-operate.

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

Sylvia Meller

Full name: Sylvia Meller

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.: DS01

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

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.: Important details are missing

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.: All new buildings should be fitted with solar panels, heat pumps, up-to-date insulation, bird boxes, swift and bat friendly roofs, bug bricks.

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

4(b). If no, please give details of why you consider this part of the High Quality Design chapter fails to comply with the duty to co-operate. Please be as precise as possible.: All new buildings should be fitted with solar panels, heat pumps, up-to-date insulation, bird boxes, swift and bat friendly roofs, bug bricks.

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

Full name: Sylvia Meller

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.: TR04

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.: Parking in new developments should not be taking up even more space

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, 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 sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Parking spaces for new developments should be build underground to free up more space. Same for big parking lots which should be build as parking houses to reduce the area they are impacting. Existing parking lots of big businesses should be encouraged to build solar panel roofs over the parking space.

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.: Same as 3b and 3c

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

Full name: Sylvia Meller

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.: OL03

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

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: No new developments should be granted on National Landscapes, Coastal Preservation Areas or Green Wedges under any circumstances

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter 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 Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: We do have enough area which can be used for housing our locals. Before building up new areas we should first of all make sure all council flats/houses are used .Buildings/flats which stand empty need to be compulsory purchased and sold/rented out . The purchase of 2nd homes needs to be limited to a minimum. If new developments need to be build , apartment blocks with affordable 1-2 bedroom flats to buy or rent should be prioritised over developments of individual houses. Developments should not be granted outside settlement boundaries , on areas of National Landscape, Coastal Preservation Areas or Green Wedges

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

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See 3b and 3c

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

Full name: Sylvia Meller

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

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: No new developments should be granted on National Landscapes, Coastal Preservation Areas or Green Wedges under any circumstances

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter 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 Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: We do have enough area which can be used for housing our locals. Before building up new areas we should first of all make sure all council flats/houses are used .Buildings/flats which stand empty need to be compulsory purchased and sold/rented out . The purchase of 2nd homes needs to be limited to a minimum. If new developments need to be build , apartment blocks with affordable 1-2 bedroom flats to buy or rent should be prioritised over developments of individual houses. Developments should not be granted outside settlement boundaries , on areas of National Landscape, Coastal Preservation Areas or Green Wedges

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

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See 3b and 3c

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

Full name: Sylvia Meller

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 13

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.: In a time of climate emergency , in a country with a huge decline of biodiversity, we should not even consider any developments in areas of natural importance

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.: No developments should be granted in areas of environmental importance. We do have enough area which can be used for housing our locals. Before building up new areas we should first of all make sure all council flats/houses are used .Buildings/flats which stand empty need to be compulsory purchased and sold/rented out . The purchase of 2nd homes needs to be limited to a minimum. If new developments need to be build , apartment blocks with affordable 1-2 bedroom flats to buy or rent should be prioritised over developments of individual houses. Developments should not be granted outside settlement boundaries or on areas of National Landscape

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

4(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See 3b and 3c

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

Full name: Sylvia Meller

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.: HE02

3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?: No

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.:

History is important but our future is more important. This is why it should become easier, without too many regulations to re-develop listed buildings

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.: Rules and regulations to re-develop listed buildings should be scrapped to avoid those buildings to fall into dis-repair and to provide housing without having to destroy even more of our environment

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

4(b). If no, please give details of why you consider this part of the Our Outstanding Historic Environment chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See 3b and 3c

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

Full name: Sylvia Meller

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?: 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.: In a time of climate emergency we can not allow even more of our landscape to be destroyed by new housing developments which are not even affordable by locals

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.: Before building up new areas we should first of all make sure all council flats/houses are used .Buildings/flats which stand empty need to be compulsory purchased and sold/rented out . The purchase of 2nd hoes needs to be limited to a minimum. If new developments need to be build , apartment blocks with affordable 1-2 bedroom flats to buy or rent should be prioritised over developments of individual houses. Developments should not be granted outside settlement boundaries or on areas of National Landscape

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

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See 3b and 3c

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

Full name: Sylvia Meller

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?: 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.: In a time of climate emergency we can not plaster our landscape with even more developments which are usually not affordable and do not help the locals with finding suitable places to live

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.: Before building up new areas we should first of all make sure all council flats/houses are used .Buildings/flats which stand empty need to be compulsory purchased and sold/rented out . The purchase of 2nd hoes needs to be limited to a minimum. If new developments need to be build , apartment blocks with affordable 1-2 bedroom flats to buy or rent should be prioritised over developments of individual houses. Developments should not be granted outside settlement boundaries or on areas of National Landscape

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

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See 3b and 3c

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

Full name: Sylvia Meller

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.: Yes, we do have to provide more homes. But if this is the case, why are we having empty council houses/flats? Why do we have developments with mainly unaffordable housing? Why do we have a high number of houses that stand empty or are only used for a few weeks a year as 2nd homes?

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.: Before building up new areas we should first of all make sure all council flats/houses are used .Buildings/flats which stand empty need to be compulsory purchased and sold/rented out . The purchase of 2nd hoes needs to be limited to a minimum. If new developments need to be build , apartment blocks with affordable 1-2 bedroom flats to buy or rent should be prioritised over developments of individual houses. Developments should not be granted outside settlement boundaries or on areas of National Landscape

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

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See 3B and 3C

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

Full name: Sylvia Meller

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.: In addition to the named requirements there are some additional ones that should be added

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.: The additional requirements should be mandatory bird boxes, swift and bat friendly roofs, bug bricks, wildlife friendly outdoor lights, parking spaces to be build underground - for businesses as park houses and all outside parking to be fitted with solar panel roofs.

4. Do you consider that this part of the Mitigating 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 Mitigating Climate Change chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See 3b and 3c

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

Full name: Sylvia Meller

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.: I do agree with the whole chapter. But, why are we still having lots of empty council flats/houses? Why are we having lots of houses which are empty throughout most of the year or are used as holiday lets? Why are we having planning applications for developments with mainly unaffordable housing? Why are we having planning applications in areas that are National landscapes? We should be looking into creating affordable 1-2 bedroom flats in apartment blocks instead of individual houses to reduce the environmental footprint as well as deliver flats which are more needed than houses.

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.: Instead of building up even more green space we should look at other options. Why are we still having lots of empty council flats/houses? Why are we having lots of houses which are empty throughout most of the year or are used as holiday lets? Why are we having planning applications for developments with mainly unaffordable housing? Why are we having planning applications in areas that are National landscapes? Why are we only seeing planning applications for individual houses instead of apartment blocks with flats?

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.: Restore council flats so they can be made available. Compulsory purchase flats/houses which are empty/derelict and convert into affordable or council flats/houses. Stop 2nd home purchases. Stop developments which have less than 75% affordable houses. Stop developments on areas of National

landscapes , flood plains. Give planning permission to apartment blocks instead of individual houses.

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.: Looking at all the local planning applications, there is not one that would provide enough affordable housing, doesn't destroy our landscape of natural beauty, our environment. If the Meeting Housing Needs wants to be cooperating with the locals, then listen to what they really want or don't want. We do not want our green areas build up , we want affordable flats not houses.

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

Full name: Sylvia Meller

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 SA is clearly not sustainable. Before building up new areas we should first of all make sure all council flats/houses are used .Buildings/flats which stand empty need to be compulsory purchased and sold/rented out . The purchase of 2nd hoes needs to be limited to a minimum. If new developments need to be build , apartment blocks with affordable 1-2 bedroom flats to buy or rent should be prioritised over developments of individual houses. Developments should not be granted outside settlement boundaries or on areas of National Landscape

Elizabeth Mew

Full name: Elizabeth Mew

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

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

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

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

Land north of Behind Hayes (Otto_01) The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the northwestern part of the site is not appropriate for built development. This land should be kept open and made available as a community open space/orchard or similar use. Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets. Vehicular access needs to be to the east/Orchard Drive.

The site is an ancient orchard that needs to be protected and managed for its cultural, heritage and potential biodiversity significance and is already deemed as inappropriate for built development on the northwestern side. However, it is not clear enough in the local plan (above paragraph and map) as to the exact area the 'northwest side' refers to. The surveyors have been surveying the whole of the paddock in recent days, including the south and the west which is of concern.

It is important that the village retains its rural character by preserving green spaces in between housing and other buildings to maintain the landscape and rural heritage rather than using these areas for infill which would permanently impact the important

wildlife that may exist as well as the landscape view of the conservation area. The orchard could be used for outdoor educational purposes, especially due to its proximity to the school especially as the latter has very limited outdoor space.

There are more suitable sites for development, for example brownfield sites on the outskirts of the village that would have far less negative environmental impact.

While there are constraints mentioned in the local plan regarding the landscape importance of the orchard, there is a lack of reference to protection / enhancement of biodiversity or to the alternative educational and community uses that it could provide.

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

- The wording in the local plan needs to be more precise on the exact area of the orchard that is proposed for the housing development, and which will be preserved as a community orchard (or similar).
- The wording needs to include reference to biodiversity/ wildlife importance and protection, including protection of trees
- The wording should make reference to alternative uses of the area to housing, such as livestock grazing and educational opportunities

Below, I have made suggestions for rewording the local plan paragraph.

The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the north western and south western part of the site is not appropriate for built development. This latter section of the land in question should be kept/ preserved as a historic orchard and made available as a community open space/orchard or similar use, managed for the benefit of people and wildlife. Development should be very carefully designed to ensure that it is compatible with the

National (or should this be Natural?) Landscape and adequately mitigates any impact on the surrounding heritage assets and the natural environment as well as considering the educational value of the green space. Vehicular access needs to be to the east/Orchard Drive.

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

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

Abi Mewse

Full name: Abi Mewse

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site conflicts with Local Plan policies and lacks evidence of sustainability

I strongly object to the inclusion of site Whim_08a in the Local Plan on grounds of soundness. This allocation fails several tests of sound planning and contradicts numerous Local Plan policies.

The site is part of the Green Wedge between Whimble and Cranbrook. According to Policy OL05, development should not be permitted where it risks settlement coalescence or damages the rural character of the landscape. Allocating this site will contribute to the erosion of Whimble's individual identity and breaches the intent of this policy.

Furthermore, there is no safe pedestrian access to village services. Residents would need to use Church Road, which is narrow, without pavements, and considered unsafe by the police and the local Community Speed Watch group. This directly conflicts with Policy TR01, which seeks to promote walking and cycling.

The allocation also ignores the Whimble Housing Needs Survey, which found a need for just 4 affordable homes over the next five years. Allocating 83 homes in the village (including the Whim_11 site) is inconsistent with this evidence and conflicts with Policy

HN01, which stresses that developments must respond to documented local housing needs.

There are unconfirmed wildlife habitats that haven't been investigated. The Parish Council's preference would be that a site is allocated to the east of Church Road so that it is nearer to the established infrastructure near the Hand and Pen (Bramley Garden's is to the West). It is the view of the Parish Council that further work should be carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimble. The spontaneous decision to offer up Bramley Gardens was inappropriate and against expert advice.

The allocation fails to consider the 1,500 homes already approved in the Cobdens Expansion of Cranbrook, which sits within Whimble Parish and includes a school and traveller site. Given the existing infrastructure in that area, additional allocation in Whimble village itself is unnecessary and unjustified.

In addition, the partial allocation was previously deemed inappropriate by EDDC officers. No new flood risk assessments or environmental assessments have been completed to support this change. This makes the plan unsound, as it is not based on proportionate evidence.

Full name: Abi Mewse

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

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

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

Unsound allocation contrary to spatial strategy, officer advice and infrastructure limitations I object to the allocation of site Whim_08a in Policy SD29 of the EDDC Emerging Local Plan on the grounds of soundness. The decision to allocate this site contradicts professional planning advice and is not supported by robust evidence.

At the October 2024 Strategic Planning Committee, EDDC's own planning officers recommended that Whim_08 was unsuitable for allocation. They cited reasons including incompatibility with the spatial strategy, a lack of safe pedestrian access, and impact on the Green Wedge. Despite this, the Committee reversed its decision one month later in November, allocating part of the site without providing any evidence or justification for the change. This lack of transparency and disregard for expert opinion undermines the justified and effective tests of soundness.

Furthermore, Church Road, the main access route, is narrow, lacks pavements and is not a safe route for pedestrians. There is a high risk to public safety, particularly for children walking to the local school, and this contradicts the objectives of Policy TR01 to prioritise sustainable travel.

The plan also fails to consider the 1,500 homes already approved in the Cobdens Expansion of Cranbrook, which sits within Whimble Parish and includes a school and traveller site. Given the existing infrastructure in that area, additional allocation in Whimble village itself is unnecessary and unjustified.

Whimble is classified as a Tier 4 settlement, where only limited development should occur. However, the plan proposes 83 houses in total (Whim_11 and Whim_08a), far exceeding the 4 affordable homes identified as needed in the Housing Needs Survey. This goes against Policy SP01 and HN01, which state that development should match local needs and fit the character of the village.

The allocation of Whim_08a ignores this context and the professional recommendation that even partial allocation was inappropriate. Without updated evidence or justification, the plan does not meet the justified or effective tests of soundness and should be amended to remove this site.

Trick Michael

Full name: Trick Michael

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmouth 20 would increase the requirement for travel by motor vehicles. This is contrary to figure 7 the energy and increase substantially traffic congestion. This in conflict with Paragraph 11.2. These residents would have to travel further than 800m to any key services and facilities, contrary to Paragraph 11.6. These residents huge amount of weekend traffic from playing fields and archery club on weekends will exacerbate the existing issues that exist. Budleigh Salterton would be the nearest accessible town and the schools, doctors would be under further increased-pressure. This is contrary to Policy TR01

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

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

Jane Michel

Full name: Jane Michel

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of EXMO_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, doctors, school, beach etc.) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II listed church, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, elimination the "tranquility, wildness and dark skies", which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolation habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30/01/25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the

SAC/SPA. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook though Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. This isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I feel very strongly about this plan and would wish to ensure that my, and many other residents', opinions are heard.

Jim Milburn

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan as it remains "not suitable or achievable".

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan as it remains "not suitable or achievable".

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

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

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use on the Pebblebed Heaths.

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

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access for the site leads naturally down the road into Budleigh High Street whereas to go into Exmouth would require travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The Budleigh High Street, Doctor's surgery, primary school, beach and shops would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

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

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

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

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

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

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified "Strategic Nature Area" (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

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

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) asserts there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would funnel traffic along the boundary of the Pebblebed Heath.

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA).

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

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

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not "modest" development. It is a "comprehensive development scheme" within a rural part of East Devon.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan to preserve the outstanding charm and character of this part of rural East Devon.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would produce highly significant vehicle movements to access services within Exmouth and the neighbouring towns using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the increased number of vehicle movements from this site will be on rural B roads, notorious for being congested and substandard.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure it will not add another Doctors surgery or Dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - Exmouth Community College is already at/over capacity. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will greatly increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of

0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time a resident goes out / returns. In addition to this, the distance from the B3179 site entrance into Exmouth centre requires a drive of over 4 miles. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for going shopping or to work/school etc because the distance is too far. Studies cited in the Local Plan show that most people prefer to walk if their destination is within half a mile, and beyond 1 mile cars are the main means of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is extremely unlikely. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate. because the steep local topography and distance to access essential infrastructure and services is simply too far. It will also be a difficult location for those without car access and potentially cause social exclusion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jim Milburn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Even though Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from the town centre and detached from it; it cannot therefore be considered to be a development in Exmouth. The town is unsuitable for further significant growth due to its location on a peninsula. The town centre being at the south end of the peninsula makes 360 degree development impossible and with much existing development already stretching a long way from the town centre, any new development is closer to neighbouring villages and towns and therefore not development at the principal centre of Exmouth. Any development here will be away from the town such that it is an unsustainable location.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Roy Arthur Miles

Full name: Roy Arthur Miles

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is closer to Budleigh Salterton than Exmouth, making Budleigh its most accessible town. This would lead to con;escence of Budleigh and Exmoth, contrary to POLICY OL05 of the Local Plan.

Exmo_20 would increase the need for car travel and congestion on unsuitable roads

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, or reduce the size Do not access the site via the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Michael Miller

Full name: Michael Miller

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would ruin the "tranquility, wildness and dark skies" of the countryside which is out of line with policy OL01. Exmo_20 would adversely affect habitats, including ancient trees and hedgerows, and wildlife corridors, contrary to paras 13.9 and 13.23 of the Local Plan. Exmo_20, as proposed, would greatly increase road traffic in conflict with para 11.2. Essential services are mainly over 2 miles distant (contrary to para 11.6). Walking or cycling to Budleigh or Exmouth would be hazardous in the extreme; not consistent with Policy TR01. What thought has been given to the need for essential services - health and schools in particular? There is a danger that these facilities in Budleigh would be insufficient to cope with the development. The proposed location of Exmo_20 could intensify the flood risk (in conflict with policy ARO1B) particularly at the bottom of the site and through Withycombe.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reconsider the size of Exmo_20, or its access from the B3179, but ideally take it out of the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

John Miller

Full name: John Miller

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less harm to the Pebblebed heatjs {SAC/SPA] Developing Exmo_20 is contrary to the local plan and not in accordance with the mitigation strategy. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. It is unsustainable development and people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to Policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Anthony AJ Miller

Full name: Anthony AJ Miller

Other party name (if relevant): Uplands

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.: Imposition of this plan conflicts with my human rights, in particular peaceful enjoyment of my property as cited in the ECHR ruling

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.: Delete this part of the local plan

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.: Denies property owners rights to develop their property. will cause property to reduce in value Will make more difficult to sell property Evidence of coastal erosion vary widely and is therefor not a firm basis for local plan decisions

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.: Delete this part of the local plan

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.: See answer to soundness question

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate 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 property owners concerns and rights are seriously considered and actioned upon.

Mary F Miller

Full name: Mary F Miller

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.: the ECHR states we have the right to peaceful enjoyment of our property, which includes housing. Carrying out this section of the local plan will seriously impede this right.

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.: Local plan should be revised to exclude this section

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.: Right to extend or develop one's property is denied. Value of property will reduce Selling a property will be more difficult as a result A local plan should be based on sound evidence - this is not the case as previous erosion rates and timing vary considerably.

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.: Local plan should not included decision making evidence which varies so widely.

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.: See answer to soundness question

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sean Mills

Full name: Sean Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXmo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into account

Casey Mills

Full name: Casey Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMo_20 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into account for consideration

Charlie Mills

Full name: Charlie Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

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? 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.

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4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into serious consideration

Marico Mills

Full name: Marico Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

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? 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.

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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.

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4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into serious consideration.

Suzanne Mills

Full name: Suzanne Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

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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

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: to ensure that our views are heard and taken into serious account and consideration.

Simon Mills

Full name: Simon Mills

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

When my wife and I first moved to the village five years ago, one of the first things we did was attend the village fete and thought it was brilliant that the Broadclyst Neighbourhood Plan was on display and we had a democratic say on the plan. It is my opinion that East Devon District Council (EDDC) has failed in the duty to respect the Broadclyst Neighbourhood Plan, particularly in relation to housing allocations.

The Parish has already met its housing commitments through significant development at Tithebarn and West Clyst, as outlined in our Neighbourhood Plan, which was designed to reflect the needs and wishes of the community. Despite this, EDDC has proceeded to allocate an additional 100 houses at Wintergardens, contrary to the principles of localism and in disregard of the carefully considered planning framework established by our Neighbourhood Plan.

This action is flawed for the following reasons:

- **Community Planning Efforts:** The Neighbourhood Plan represents the voice of our community and should be a key document in local planning decisions.
- **Sustainable Development:** The Parish cannot sustainably support additional housing developments without overwhelming local infrastructure and amenities. Pinhoe and Broadclyst surgery cannot cope with the current significant increase in patient list size. Broadclyst is at capacity and cannot cope with this further increase.

- **Overloading Parish Infrastructure:** The decision to allocate 100 additional houses at Wintergardens places undue strain on local infrastructure, schools, healthcare services, and roads.
- **Undermines Public Trust:** The allocation disregards community consultation and compromises the trust between Broadclyst Parish Council, its residents, and EDDC.
- **Neglects Community Engagement:** The community's concerns and the Parish Council's objections have been ignored, eroding public trust in the planning process.
- **Failed to Respect the Broadclyst Neighbourhood Plan:** EDDC has disregarded the established housing allocations for Broadclyst Parish, undermining the local democratic process.
- **Contains misleading statements:** I think that your statement that "some support for the site to be allocated is evident" is completely misleading. You make no reference to EDDC public consultation process on this site, where over 300 people said they were dissatisfied or unhappy about development here. Please know that this plan is hugely contentious and unpopular amongst local residents.
- **Flawed rationale:**
 - o It seems only EDDC strategic planning committee, the owner of the land and LVA are in support of this development, the former to meet housing targets and the latter to make money.
 - o EDDC officers originally recommended 70 dwellings at Broadclyst 12a, as anything bigger would be "detrimental" to the village more generally. Any further development in Broadclyst will put an unsustainable strain on roads, services and schools. There isn't anyone in the village who would dispute this.
 - o Parish housing needs have been met several times over in the past decade with developments at Cranbrook, Tithebarn and Westcyst. Therefore these houses are superfluous to requirements, and it is purely for profit.
- **Bio-diversity impact:** how can building 140+ homes on green fields, result in a 10% increase in bio-diversity? Building houses here will adversely affect the local bat population which use this area. It will also affect the rookery that is opposite this site. This is a farmland area with bio-diversity, that needs to remain as it is. You can significantly increase the bio-diversity by taking positive action on the current site, as it exists, without adding unnecessary buildings to the site.
- **Increased flood risk:** Flooding is a major concern of residents living adjacent to the proposed site. These fields are frequently saturated, and often flooded, during the autumn and winter period. The fear is that adding more concrete and tarmac to the area will only increase the risk of flooding on the site and to the local community if this plan is approved.

- Increased risk of serious injury: adding more traffic to the Whimble Road, without sufficient walkways has the potential to significantly increase the risk of accident or injury to people who have to walk the lane.
- Covenants: There are local covenants on what residents can and cannot do to their properties, and need to seek permission when they do make certain changes to maintain the integrity of the village. Building these houses do not maintain this integrity and will have a significant detrimental impact.

For these reason's East Devon District Council should immediately reverse the allocation of 100+ houses at Wintergardens, and recommit to honouring the democratic process with the Broadclyst Neighbourhood Plan in all future planning decisions.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: When my wife and I first moved to the village five years ago, one of the first things we did was attend the village fete and thought it was brilliant that the Broadclyst Neighbourhood Plan was on display and we had a democratic say on the plan. It is my opinion that East Devon District Council (EDDC) has failed in the duty to respect the Broadclyst Neighbourhood Plan, particularly in relation to housing allocations.

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- **Undermines Public Trust:** The allocation disregards community consultation and compromises the trust between Broadclyst Parish Council, its residents, and EDDC.
- **Neglects Community Engagement:** The community's concerns and the Parish Council's objections have been ignored, eroding public trust in the planning process.
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 - o Parish housing needs have been met several times over in the past decade with developments at Cranbrook, Tithebarn and Westcyst. Therefore these houses are superfluous to requirements, and it is purely for profit.
- **Bio-diversity impact:** how can building 140+ homes on green fields, result in a 10% increase in bio-diversity? Building houses here will adversely affect the local bat population which use this area. It will also affect the rookery that is opposite this site. This is a farmland area with bio-diversity, that needs to remain as it is. You can

significantly increase the bio-diversity by taking positive action on the current site, as it exists, without adding unnecessary buildings to the site.

- Increased flood risk: Flooding is a major concern of residents living adjacent to the proposed site. These fields are frequently saturated, and often flooded, during the autumn and winter period. The fear is that adding more concrete and tarmac to the area will only increase the risk of flooding on the site and to the local community if this plan is approved.
- Increased risk of serious injury: adding more traffic to the Whimble Road, without sufficient walkways has the potential to significantly increase the risk of accident or injury to people who have to walk the lane.
- Covenants: There are local covenants on what residents can and cannot do to their properties, and need to seek permission when they do make certain changes to maintain the integrity of the village. Building these houses do not maintain this integrity and will have a significant detrimental impact. For these reasons East Devon District Council should immediately reverse the allocation of 100+ houses at Wintergardens, and recommit to honouring the democratic process with the Broadclyst Neighbourhood Plan in all future planning decisions.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This action is flawed for the following reasons:

- Community Planning Efforts: The Neighbourhood Plan represents the voice of our community and should be a key document in local planning decisions.
- Sustainable Development: The Parish cannot sustainably support additional housing developments without overwhelming local infrastructure and amenities. Pinhoe and Broadclyst surgery cannot cope with the current significant increase in patient list size. Broadclyst is at capacity and cannot cope with this further increase.

- **Overloading Parish Infrastructure:** The decision to allocate 100 additional houses at Wintergardens places undue strain on local infrastructure, schools, healthcare services, and roads.
- **Undermines Public Trust:** The allocation disregards community consultation and compromises the trust between Broadclyst Parish Council, its residents, and EDDC.
- **Neglects Community Engagement:** The community's concerns and the Parish Council's objections have been ignored, eroding public trust in the planning process.
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- **Contains misleading statements:** I think that your statement that "some support for the site to be allocated is evident" is completely misleading. You make no reference to EDDC public consultation process on this site, where over 300 people said they were dissatisfied or unhappy about development here. Please know that this plan is hugely contentious and unpopular amongst local residents.
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 - o It seems only EDDC strategic planning committee, the owner of the land and LVA are in support of this development, the former to meet housing targets and the latter to make money.
 - o EDDC officers originally recommended 70 dwellings at Broadclyst 12a, as anything bigger would be "detrimental" to the village more generally. Any further development in Broadclyst will put an unsustainable strain on roads, services and schools. There isn't anyone in the village who would dispute this.
 - o Parish housing needs have been met several times over in the past decade with developments at Cranbrook, Tithebarn and Westcyst. Therefore these houses are superfluous to requirements, and it is purely for profit.
- **Bio-diversity impact:** how can building 140+ homes on green fields, result in a 10% increase in bio-diversity? Building houses here will adversely affect the local bat population which use this area. It will also affect the rookery that is opposite this site. This is a farmland area with bio-diversity, that needs to remain as it is. You can significantly increase the bio-diversity by taking positive action on the current site, as it exists, without adding unnecessary buildings to the site.
- **Increased flood risk:** Flooding is a major concern of residents living adjacent to the proposed site. These fields are frequently saturated, and often flooded, during the autumn and winter period. The fear is that adding more concrete and tarmac to the area will only increase the risk of flooding on the site and to the local community if this plan is approved.

- Increased risk of serious injury: adding more traffic to the Whimble Road, without sufficient walkways has the potential to significantly increase the risk of accident or injury to people who have to walk the lane.
- Covenants: There are local covenants on what residents can and cannot do to their properties, and need to seek permission when they do make certain changes to maintain the integrity of the village. Building these houses do not maintain this integrity and will have a significant detrimental impact.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jonathan Milsom

Full name: Jonathan Milsom

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

5.5

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development (Honi_18) to add 136 houses to the rear of King's Road in Honiton does not appear to be sound. The selection of this site does not appear to have had the correct level of positive preparedness (using the taxonomy of the commentary process) due to the introduction of another busy access point to the A35 that will add a traffic choke point and increase the likelihood Road Traffic Collisions (RTCs).

The proposed estate would require access to 136 houses from the very busy A35 main trunk road between Honiton and Axminster. This road already has a very high level of largely through town traffic flow with heavy lorries, vans, commuter and seasonal tourist car traffic that need to pass through Honiton as there is no other alternative to join the A30 from the South Coast.

Access to the estate would either need to be opposite the existing Waterleat Road junction (which already often has long queues to join or exit from) to the existing farm track entrance or at a new access above it between Waterleat Road and 2 houses located approximately 150m away. Due to the route of the A35 any new entrance to the housing estate would be obscured to traffic coming downhill on the A35 until they pass the 2 houses.

The A35 is a 60mph road with tight bend (that does slow the traffic to some extent as it enters Honiton) but the addition of a new junction below the 2 houses above with the addition of more traffic trying to access / leave the A35 at peak commuter time is likely to become a further choke point on the roads around Honiton and increase the likelihood of RTCs.

I understand that there is a need to build more houses in the UK and that Honiton need to contribute to that but of all the sites proposed for development around Honiton, Honi_18 seems to offer the most downsides due to its proximity to the A35. The increased congestion and risk of RTCs will have an impact on all users of that road.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access to this estate from the A35 comes with considerable additional risk of RTCs and further congestion. To make this proposal sound then the route of the A35 will need to be changed so that the any proposed entrance to the Honi_18 will be visible to traffic entering Honiton from the Axminster direction. A further option would be to consider a complete re-route of the A35 to avoid the need for through traffic to use the roundabout at the junction of the A35 (Monkton Rd and King's Rd) and A375 (High St).

The other option would be to use Hale Lane as an entrance to the estate. This again would add further traffic volume joining the A35 at another busy junction.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Andrew Minter

Full name: Andrew Minter

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Figure 1

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Yes

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: Yes

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

As has been pointed out in various meetings and correspondences over the years, 2/3 of East Devon is classified as 'National Landscape' and so outside the scope of development, including WHOLE TOWNS such as Budleigh Salterton and Sidmouth. As a result, almost the entire so-called 'requirement' for development of sites (a Central Government requirement that has NOT apparently been challenged by East Devon District Council) falls on the remaining 1/3 of the district, specifically Exmouth and along the Exe Estuary. This is leading to/ has led to the destruction of ecologically and environmentally sensitive green areas and also has led to the loss of agricultural land upon which this country will increasingly have a need on which to depend. EDDC needs to ROBUSTLY challenge the housing targets imposed upon it by Central Government, and threaten to build on National Landscape/ AONB to push the issue.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to push the need to challenge Central Government housing targets imposed on EDDC. Devon is one of the poorest funded counties, with increases in funding this year leaving Devon near the bottom of the 'hand-out' table, thanks to the previous sensible money management undertaken by DCC!

Full name: Andrew Minter

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.2

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.:

3.2: Infrastructure cannot cope at present (schools, sewage, surgeries, social care, etc) in this part of East Devon...There is NO MENTION of how the infrastructure to accompany these unwanted building lands will be funded, let alone delivered.

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.: Make Lympstone a Service Village, NOT a local centre

In SD01 show Lymp_07 as being part of Lympstone, NOT a distant part of Exmouth; it isn't part of Exmouth.

State that EDDC will consider significant development of the National Landscape/AONB in order to meet Central Governments MISGUIDED and INCORRECT targets...(for goodness sake EDDC, be a bit more militant!)

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: see comments above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : I want my voice to be heard

Full name: Andrew Minter

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.4

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.:

3.4: Lympstone is MISCLASSIFIED as a local centre, just because it has a tiny station with 13 car parking spaces (used by locals!). It is in reality a service village of 900 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.: Make Lympstone a Service Village, NOT a local centre

In SD01 show Lymp_07 as being part of Lympstone, NOT a distant part of Exmouth; it isn't part of Exmouth.

State that EDDC will consider significant development of the National Landscape/AONB in order to meet Central Governments MISGUIDED and INCORRECT targets...(for goodness sake EDDC, be a bit more militant!)

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: see comments above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : I want my voice to be heard

Full name: Andrew Minter

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?: 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.: SP01 The spatial strategy states that it is to provide 'Sustainable Housing in the west' of the district. From Exmouth to Lympstone will be an urban sprawl with the current emerging plan proposals. The traditional and legal green wedge between the two to prevent coalescence and maintain Spirit of Place will be irretrievably lost and Exmouth will in turn subsume Exton, Ebford and link up with Topsham. EDDC should consider the nuclear option instead of developing on the 2/3 of the district that is National Landscape/AONB, instead of destroying the ecologically and historically important Estuary and villages along it.

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.: Make Lympstone a Service Village, NOT a local centre

State that EDDC will consider significant development of the National Landscape/AONB in order to meet Central Governments MISGUIDED and INCORRECT targets...(for goodness sake EDDC, be a bit more militant!)

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: see comments above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : I want my voice to be heard

Full name: Andrew Minter

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

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: SP03 - This table is disingenuous and has been massaged to show the reader what EDDC wants them to believe rather than what is the case. The table purports to set out that the vast majority of new or emerging Neighbourhood Plans do not propose any housing developments in their regions. Speaking SPECIFICALLY for Lympstone Parish Council (LPC), which is in the process of updating its Neighbourhood Plan (which expires in 2026), LPC was SPECIFICALLY told by EDDC NOT to include any house building targets in its emerging plan UNTIL the new EDDC Local Plan had been agreed. So Of Course there are zero new houses in the emerging plan! How to make EDDC look so good and to unfairly and incorrectly label the village and towns councils as conservative NIMBYs when all that town and village councils want to do is manage sustainable housing growth so SPIRIT OF PLACE is not completely destroyed.

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: 2b contents should be inserted into the plan, or at least the statement that village and town councils were instructed to WAIT for the EDDC LP to be finalised before putting new housing numbers in

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: see comments above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : I want my voice to be heard

Full name: Andrew Minter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: At the site allocation meeting in October 2024 (EDDC SPC chaired by *** Personal details have been removed ***), Lymptstone Parish Council (LPC) was not allowed to talk on site GH/ED/72a a site nominally in Woodbury Parish but 2.5 miles distant from Woodbury village, but on the edge of Lymptstone Village, so directly impacting Lymptstone not Woodbury. It is a site owned by a Woodbury Parish Councillor who voted on its inclusion as a site offered for development by Woodbury Parish Council. A conflict of interests and also contrary to the Nolan Principles for Civil Servants. A formal complaint was raised about not being able to speak on a site that would directly impact Lymptstone, not Woodbury. This was dismissed. However, the site now magically is included with Lymptstone Settlement, which was the concern all along. This is GERRYMANDERING and anti-democratic.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site should be excluded from the Plan and revisited as part of the Lymptstone Parish Council plan, NOT the Woodbury plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

SD01 Exmouth Lympt_07 Courtland Cross is in Lymptstone Parish and is on the Lymptstone side of the anti-coalescence Green Wedge between Lymptstone and

Exmouth. It is in Lympstone and c 2 miles distant from Exmouth Centre. It is a Lympstone site, not an Exmouth site and should be marked as such. 100 houses

Lymp_14 Coles Fields Is part of Lympstone and not part of Exmouth. It is very far from the centre of Lympstone AND Exmouth. 59 houses.

159 houses allocated to Lympstone Settlement.

SD10 Lympstone As above GH/ED/72a should be removed and revisited with LYMPSTONE Parish Council, not Woodbury, due to conflict of interest, Nolan Rules breach and gerrymandering. 42 houses.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See 3b above.

Lympstone to gain 159 houses from SD01 (Lymp_07 and Lymp_14), GH/ED/72a to be removed and revisited with the correct Consultation Process. Lympstone sites in the plan show an increase of 251 houses a 30% increase in the size of Lympstone Village, which should be a Service Village, NOT a Local Centre. This would irretrievably damage Lympstone, destroy its Sense of Place, and make the village unliveable.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See 2b, 2c, 3b and 3c above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Previous complaints and observations have been ignored, rode roughshod over and allocations incorrectly and surreptitiously applied

Full name: Andrew Minter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

SD01: Lymp_07 Courtlands Cross is in Lympstone Parish and is on the Lympstone side of the existing green wedge between Exmouth and Lympstone. It is UNTRUE/ DISINGENUOUS/ A LIE to say that it is part of 'Exmouth Settlement'. This was pointed out at the site selection SPC in October 2024 and subsequently and has been part of a series of formal complaints inadequately answered by EDDC.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Make Lympstone a Service Village, NOT a local centre

In SD01 show Lymp_07 as being part of Lympstone, NOT a distant part of Exmouth; it isn't part of Exmouth.

State that EDDC will consider significant development of the National Landscape/AONB in order to meet Central Governments MISGUIDED and INCORRECT targets...(for goodness sake EDDC, be a bit more militant!)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: see comments above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want my voice to be heard

Mark Robert Moffat

Full name: Mark Robert Moffat

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The developments around Lympstone at least do not appear to be sustainable. There is a lot of development already underway in Exmouth and Lympstone with little regard as to whether the infrastructure can support it. Secondary schools are close to or beyond capacity and no plans for how additional health care would be provided are apparent. The majority of the traffic originating in the area passes through the Sandygate roundabout, which is at 84% capacity already. Already, during the main commuter times, it can easily take half an hour to travel the four and a half miles between Lympstone and the Sandygate roundabout. If the intention behind the new Dinan way bypass is to increase the flow of traffic onto the A376, then this will only make the situation worse. The proposed developments Exmo_23, Lymp_01, Lymp_07, GH/ED/72A and GH/ED/73 also demonstrate a lack of awareness of the local infrastructure. Although Lympstone does have a small railway station, the railway runs alongside the river Exe estuary, so any new development has to take place to the East of the station, outside the current built up area boundary and at considerable distance. In this situation, it is highly unlikely that the occupants of any new development would use rail travel to any significant extent. Due to being bounded by the estuary on the western side, all traffic entering and leaving Lympstone must use or cross the A376. Increasing the size of Lympstone village by such a large proportion, with no possibility for alternative routes of entry or exit can do nothing but increase congestion both within the village and on the A376 itself. Site Lymp_07 is upstream of Lympstone, within the rainwater catchment of the Wotton Brook and increasing the risk of flooding in the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Lymp_07 is within Lympstone yet has been included within the allocation for Exmouth. No good reason appears to have been given for this and the impression given is that over time, there will be a coalescence, resulting in the loss of Lympstone as a separate entity. This is a very large development in relation to the size of Lympstone. It has the potential to increase the flooding risk, being upstream of the village and situated on a clay subsoil. If development were to take place here, extensive attenuation measures should be in place. With the exception of Lymp_01, all of the proposed sites within and adjacent to Lympstone are more than 800m from existing key services and will result in increased car use. With the A376 being so congested already and only likely to get worse, sites should have been allocated in locations with at least the potential to increase infrastructure to meet the growing need.

Full name: Mark Robert Moffat

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The developments around Lympstone at least do not appear to be sustainable. There is a lot of development already underway in Exmouth and Lympstone with little regard as to whether the infrastructure can support it. Secondary schools are close to or beyond capacity and no plans for how additional health care would be provided are apparent. The majority of the traffic originating in the area passes through the Sandygate roundabout, which is at 84% capacity already. Already, during the main commuter times, it can easily take half an hour to travel the four and a half miles between Lympstone and the Sandygate roundabout. If the intention behind the new Dinan way bypass is to increase the flow of traffic onto the A376, then this will only make the situation worse. The proposed developments Exmo_23, Lymp_01, Lymp_07, GH/ED/72A and GH/ED/73 also demonstrate a lack of awareness of the local infrastructure. Although Lympstone does have a small railway station, the railway runs alongside the river Exe estuary, so any new development has to take place to the East of the station, outside the current built up area boundary and at considerable distance. In this situation, it is highly unlikely that the occupants of any new development would use rail travel to any significant extent. Due to being bounded by the estuary on the western side, all traffic entering and leaving Lympstone must use or cross the A376. Increasing the size of Lympstone village by such a large proportion, with no possibility for alternative routes of entry or exit can do nothing but increase congestion both within the village and on the A376 itself. Sites GH/ED/72a and GH/ED/73 are both situated within the Coastal Preservation Area. Allowing development there goes against EDDC's own policies and has the potential of damaging a site of international importance for wildlife. The inclusion of GH/ED 72a is vexing for Lympstone as, although it is immediately adjacent to and will negatively impact Lympstone village, putting pressure on local facilities, it is actually within the neighbouring parish of Woodbury. It was very noticeable that, although Lympstone parish councillors and our representatives on EDDC were prevented from speaking on it at the strategic meeting, Woodbury

councillors were allowed to not only speak on this site, but also to speak about one of the sites within Lympstone and not even adjacent to their own parish.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Lymp_07 is within

Lympstone yet has been included within the allocation for Exmouth. No good reason appears to have been given for this and the impression given is that over time, there will be a coalescence, resulting in the loss of Lympstone as a separate entity. This is a very large development in relation to the size of Lympstone. It has the potential to increase the flooding risk, being upstream of the village and situated on a clay subsoil. If development were to take place here, extensive attenuation measures should be in place. With the exception of Lymp_01, all of the proposed sites within and adjacent to Lympstone are more than 800m from existing key services and will result in increased car use. With the A376 being so congested already and only likely to get worse, sites should have been allocated in locations with at least the potential to increase infrastructure to meet the growing need.

jane moffatt

Full name: jane moffatt

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(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.: You state that Neighbourhood plans will be adhered to, but in the Strategic planning stage, you ignored the Lypstone Neighbourhood plan even though your council has held it up as a gold star plan. You stated that you would ignore the NP's built up boundary, the fundamental statement that the village did not want coalescence with Exmouth and wanted to keep it's sense of spirit and individual identity. You ignored the importance of the sites being in the Coastal Preservation Zone and stated that you were intentionally ignoring this.

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.: In 1.10 - 1.13 You state that Neighbourhood plans will be adhered to, but in the Strategic planning stage, you ignored the Lypstone Neighbourhood plan even though your council has held it up as a gold star plan. You stated that you would ignore the NP's built up boundary, the fundamental statement that the village did not want coalescence with Exmouth and wanted to keep it's sense of spirit and individual identity. You ignored the importance of the sites being in the Coastal Preservation Zone and stated that you were intentionally ignoring this. You also wouldn't let representatives of the Parish council speak on a site adjacent to the parish boundary which would have immense ramifications for the village. Do you think your statement that you took account of Parishes' wishes and their published NPs would hold up as being sound?

The process concerning Exmouth, Woodbury and Lypstone, the tiering of these settlements and the move to coalesce Lypstone and Exmouth through the blurring of

'settlements' and 'administrative districts' has been disingenuous at the very least and anti-democratic concerning the so-called 'consultation' with the relevant Parish Councils. Lympstone Village and parish will have a 28% increase in housing stock and coalesce with Exmouth although the numbers of houses attributed to Lympstone appears far less as these sites have been attributed to Exmouth even though in Lympstone parish. Is this honest and true cooperation? I think not.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: absolutely not! You state that Neighbourhood plans will be adhered to, but in the Strategic planning stage, you ignored the Lympstone Neighbourhood plan even though your council has held it up as a gold star plan. You stated that you would ignore the NP's built up boundary, the fundamental statement that the village did not want coalescence with Exmouth and wanted to keep it's sense of spirit and individual identity. You ignored the importance of the sites being in the Coastal Preservation Zone and stated that you were intentionally ignoring this.

Strategic meetings were long and to those watching the process, they seemed bullying and aggressive. You went against your own strategies for preservation of agricultural land, coastal areas, green wedges and the wishes to stop coalescence of villages into bigger conurbations. You ignored the fundamental wishes of residents and communities to preserve the rural landscape and failed to recognised or hear that tourism and agriculture are major parts of the local economy and also why people choose to live here. You were focused on numbers not lifestyle.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: jane moffatt

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.: TR01

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.: TR01 focuses on settlements which have public transport and/or cycle routes. This has put a huge focus for development on Lymptstone and Exmouth using the excuse that most people can use the train or cycle to work. This is simply not true and totally impractical. For residents of Lymptstone, the train only goes to Exmouth or Exeter and our recent survey of transport needs shows most households have to commute by car to both work and schools. The nearest large supermarket can only be accessed via car as it would take both train and a combination of bus routes to get to it. Walking or cycling is just not possible.

This part of the local plan is admirable but it has been used to dump overdevelopment on both these settlements.

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.: Lymptstone was designated a tier 3 settlement , allowing approx 53 houses. EDDC have assigned over 300 houses using the agrument of sustainable transport links. Remove the lymptstone sites from the plan and return to the 53 houses in the original plan.

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: jane moffatt

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.: OL03

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: No

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: The sites LYMP_07, GH/ED/72a and GH/ED/73 have been assigned in the local plan contrary to strategy OLO3 which states development will not be allowed in Coastal Preservation areas. The Exe area around the village of Lympstone has stunning views of the world renowned RAMSAR site on the Exe estuary. This area is visited by tourists and ornithologists from all over the world but EDDC have ignored the speeches by zoologists and environmental specialist and allowed these sites to be put forward.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter 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 Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove these sites from the plan.

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Nothing we said regarding the CPA and the Exe RAMSAR site around Lympstone was listened to. They actually said they were disregarding CPAs during the public sessions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: jane moffatt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

GH/ED/72a and GH/ED/73 should be located in a different site which is not in the coastal preservation area as seem on map 5a of the local plan and part of the pebblebed heath. These would fragment and isolate habitats and destroy wildlife corridors, contrary to paragraph 13.23. of the local plan. The wildlife corridors in these sites in particular take wildlife from the Exe estuary at Lypstone up to the pebblebed heath and common. These sites will be detrimental to irreplaceable habitats, veteran trees and species rich in hedgerows across the site contrary to paragraph 13.9 Both sites are upstream of the worldrenowned Exe estuary mudflats and the loss of infiltration in an area which regularly floods will then flow from these sites down into those mudflats destroying habitat. This is in conflict with policy AR01B.

Both these sites would increase the need for car travel and increase congestion on the A376. Lypstone as a small village has been targeted for housing using the excuse that it has a railway station. In truth, the majority of journeys to work, school and weekly shop is done by car. The increase in traffic congestion is in conflict with paragraph 11.2.

Lypstone being on the River exe only has one direction out and exclusively onto the A376. The access lanes already flood regularly making the village inaccessible. These sites in particular will exacerbate the flooding and access issues. The access to the A376 would be at Harefield cross which has already experienced 2 serious accidents this month alone. The A376 is at capacity and building along this road is not sustainable.

The decision to include 72a is a controversial one for the parish of Lypstone. It is in Woodbury parish and the detriment it will bring to Lypstone village by putting pressure

on already full services and infrastructure such as school, doctor, parking, flooding etc is against policy 0L05 and even worse, lymptone parish council and our EDDC councillors were banned from speaking at the strategic meeting for these sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site GH/ED/72a and GH/ED/73 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

sue moger

Full name: sue moger

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: sue moger

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan,

? Reduce the size of Exmo_20,

? Do not access the site via the B3179,

? Do not access the site via Southern Wood,

? Revert to Exmo _20b as previously proposed,

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Guy Mogridge

Full name: Guy Mogridge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17 and Exmo_20. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17. It would also not be in the public interest to build next to a SSSI! Once our farmland and green space have gone it has gone forever!

Peter Charles Montgomery

Full name: Peter Charles Montgomery

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The road infrastructure, both to and through the village, which are very dangerous particularly to pedestrians, cyclists, horses etc and any increase in population will only exacerbate this problem.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If they laid a new road with pavements from Hand and Pen (old A30) connecting the south and north of the village that should satisfy our main health and safety concerns

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Our main objection to the proposed developments in Whimble are road infrastructure, both to and through the village, which are very dangerous particularly to pedestrians, cyclists, horses etc and any increase in population will only exacerbate this problem. A footpath through the orchard north of Whim 08 is hardly going to change the situation. The road infrastructure in Whimble is similar to Branscombe – a long pavement-less lane both to and through the village and as far as I can find out just ten new homes were proposed for Branscombe in 2016 (and that's too many.)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If they laid a new road with pavements from Hand and Pen (old A30) connecting the south and north of the village that should satisfy our main health and safety concerns but we would steal be losing our green wedge as well as prime agricultural land and it would be undoubtedly harmful to wildlife. As deer use that green wedge to commute between north and south Whimble, it's essential to maintain a buffer between Cranbrook and Whimble.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No for the reasons given.

mayara moreira

Full name: mayara moreira

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB07

2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: Yes it is legally compliant but there needs to be more weight given to biodiversity and features that are already in existence and have been there for a number of years. You can't replace an ancient orchard with its old and decaying structures with some saplings and say that because more saplings have been planted than the original trees there is a net gain. Insects and animals can't wait around for 30 years for these trees to mature. We live in a special and unique environment in East Devon and we should not be afraid to say that our trees and wildlife should take president over housing if necessary.

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: Yes

4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity 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)

Vanessa Morgan

Full name: Vanessa Morgan

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 policies 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 Policies 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)

Llywelyn Morgan

Full name: Llywelyn Morgan

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 policies 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 Policies 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)

Full name: Llywelyn Morgan

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 policies 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 Policies 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)

David Morgan

Full name: David Morgan

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.: DS01

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.: Comment: Strategic Policy DS01: Design and local distinctiveness (pages 174-176). While this policy is comprehensive, historically, policies relating to high quality design and maintaining local distinctiveness have not been rigidly applied (and enforced) during the determination of planning applications. Or post-application changes to approved designs by property owners without consent have not reinforced the Local Planning Authority's commitment to maintaining design standards, before, during and after developments have been proposed. Poor design standards where new builds or alternations to existing buildings do not sit well in their context, does nothing to support good relations between neighbours or the wellbeing of those in adjacent properties who have been affected by a lax attitude to design and local distinctiveness by planning officers, enforcement officers and councillors. Design and local distinctiveness also need to be applied to all types of new build projects, including affordable housing whereby it can sit well in its context and integrate alongside market-value based dwellings. Affordable housing does not need to look "cheap and bland" compared to market-value led dwellings, as this creates a discordant social "us" and "them" attitude in some communities. Therefore, Strategy Policy DS01 needs to be recognising the need to raise the design standards and local distinctiveness of all housing.

Full name: David Morgan

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.: TR01

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.: Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport.

Comment: pages 183-4, Paragraph 11.5), quote: “Exmouth, Honiton, Seaton, and Ottery St Mary have bespoke bus services, with several high-frequency routes linking East Devon settlements to Exeter. The district has nine train stations across two lines, with significant usage increases over the past 20 years. High-quality active travel corridors, like the Exe Estuary Trail, are also present.” The Justification for Policy TR01 fails to recognise there are disparities in this ‘broad brush’ assumption contained in paragraph 11.5. Towns such as Seaton have no bus services serving the town from Exeter after 7:05PM for six days of the week, (6:05PM on Sundays), whereas Exmouth, Honiton and Ottery St Mary do. Nor is there a bus service from Axminster to Seaton after 6:30PM for six days of the week, (Mondays to Saturdays), and none on Sundays, to provide a link with Axminster’s railway station. There is also no bus service from Honiton to Seaton after 5:50PM, or after 5:05PM from Seaton to Honiton, for seven days of the week, to provide a link with Honiton and its railway station. Moreover, compared to Honiton, Sidmouth and Exmouth which have at least two bus services an hour providing a direct bus link to Exeter, Seaton on average has one bus service an hour linking the town with Exeter city, from 10am until 7PM. Furthermore, Policy TR01 does not take into account there is no early morning bus service from Seaton (before 8am) on Saturdays and Sundays to any destinations, including Axminster, Sidmouth, Honiton and Exeter, all of which are major hubs for employment, medical facilities, leisure and recreational activities. Moreover, Sunday services are also limited from Seaton, with just one bus route (the 9A) operating to provide a connection with Sidmouth and Exeter. Unlike Exmouth, Axminster and Honiton, Seaton does not have a supplementary railway to provide further travelling opportunities on public transport. Therefore, Transport Policy TR01’s ‘broadbrush’ assumption that each of the aforementioned towns has a comparable level of “high-frequency routes linking East Devon settlements to Exeter” is incorrect. It must, therefore, must be disregarded in relation to suggesting it meets the needs of residents living in Seaton and the surrounding parishes.

Full name: David Morgan

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.: OL01

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: Strategic Policy OL01: Landscape features. (pages 196-7).

Comment: I support the recommendations for this policy. However, it must be rigidly enforced by the Local Planning Authority rather than deliver a 'lip service' approach to protecting East Devon's landscape, countryside and rural areas against harmful development.

Policy OL06: Land of Local Amenity Importance and Local Green Space. (page 204).
Quote: "This policy will apply to Local Green Spaces, designated through Neighbourhood Plans (and identified on maps in those documents), and to the established Land of Local Amenity Importance areas (as shown on the Policies Map)."

Comment: I do not support the recommendation that this policy can only apply to local green spaces that have been designated through existing and new Neighbourhood Plans. Many local green spaces in settlements, whether for formal or informal use purposes, will have built up a local known history of usage over many years, which might not be recognised through a Neighbourhood Plan consultation process (if such a Plan has been prepared by a parish settlement). Other evidence such as local knowledge and Right of Way affidavits confirming a history of access and usage of green open spaces, whether for formal or informal purposes, and whether in local authority or private ownership, should be given the same weight and consideration as sites identified in Neighbourhood Plans.

Full name: David Morgan

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(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: Policy PB08: Tree, hedges and woodland on development sites. (pages 232-4). Quote: “Where justifiable and unavoidable tree and hedge losses occur, there will need to be adequate compensation for on the development site or on publicly accessible land in accordance with the minimum compensation requirements for trees.” Comment: Where ever possible, “compensation” must prioritise the replacement of trees and hedges lost on the development site with suitable comparable replacement species. This is to maintain and enhance landscapes, help reduce the visual impact of new build development, provide wildlife habitats, support sustainable drainage, and improve public health such as wellbeing through delivering a more localised connection with green nature. “Compensation” must not actively promote financial compensation for the loss of trees and hedges as an alternative preference, or the relocation of comparable species of trees and hedgerows to alternative publicly accessible land.

Full name: David Morgan

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?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 14.4

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.:

Paragraph 14.4 (page 242). Quote: “New developments, especially housing, must have access to appropriate levels of open space or contribute to new provision to avoid shortfalls. This policy sets quantified open space standards based on Fields in Trust guidelines.”

Comment: Where ever possible, this policy must place the provision and access of open space as a priority rather than actively considering an alternative financial contribution towards the provision of off-site new open space.

Full name: David Morgan

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.: OS01

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.:

Strategic Policy OS01: Access to open space and recreation facilities (page 241). Quote: “Support will be given for the provision of new and enhanced high quality open spaces and access to existing spaces and to sports and recreation facilities.”

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Strategic Policy OS01: Access to open space and recreation facilities (page 241). Quote: “Support will be given for the provision of new and enhanced high quality open spaces and access to existing spaces and to sports and recreation facilities.”

Comment: There is a need for this policy to include “protection of existing open spaces and sports and recreation facilities”.

Full name: David Morgan

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(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.:

Policy OS02: Sport, recreation and open space provision in association with development (pages 243-245). Quote: “Planning permission for new housing development, will be required to provide open space in line with Fields in Trust derived standards and Natural England’s Green Infrastructure and Accessible Greenspace Standards.” “Open space and play provision should accord with the requirements tabled below. Up to 20 homes should provide amenity green space suitable for informal play.”

Comment: Open space provision should not just focus on providing “amenity green space suitable for informal play”, but also for informal recreation purposes, such as walking, exercising a dog etc.

Full name: David Morgan

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.: OS03

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.:

Policy OS03: Location of facilities for sport and recreation and open (page 246). Quote: “Within or adjoining urban or built-up areas, planning permission will be granted for new open space areas, sports facilities and parks and gardens or for the upgrading or enhancement of existing facilities provided that unacceptable adverse amenity or environmental impacts do not arise from development. Any new or enhanced provision should be readily accessible to all people with a particular emphasis attached to ensuring safe pedestrian and cycle accessibility.”

Comment: Where ever possible, the provision of new open space areas needs to consider making it accessible for users with impaired mobility where they might require the use of mobility support aids such as wheel chairs, mobility scooters and wheeled walker frames.

Full name: David Morgan

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(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.:

Strategic Policy SP01: Spatial Strategy (pages 25-28). Quote: “Main Centres – Axminster, Honiton, Ottery St Mary, Seaton, Sidmouth: Settlements with strategic and local facilities that serve both their immediate area and surrounding communities, offering a balanced mix of jobs, services, and growth potential.” Comment: The objective for these towns does not explicitly identify the types of strategic and local facilities that serve these Tier 2 Main Centres’. Therefore, it is questionable whether a town such as Seaton is a Tier 2 ‘Main Centre’ and provides the same level of strategic and local facilities to its residents and those living in surrounding areas. Seaton does not offer the same balance or abundance of mixed jobs compared to other ‘main centres’ such as Axminster, Honiton and Sidmouth. Nor does Seaton offer the same number of services, as it does not offer facilities for secondary or further education compared to the other Tier 2 main centres. Seaton also has limited medical support services (which have been reduced in the last ten years) whereby residents are required to travel outside of the town to access many day patient services. Moreover, compared to these other main centres, Seaton does not have the same level of public transport provision, particularly in the evenings and at weekends. Therefore, this limits residents’ access to a number of key services, thereby putting the town on par with a smaller town such as Budleigh Salterton which itself is identified as a ‘local Centre’ in the Local Plan. Seaton’s unique topography and landscape characteristics also limits its potential growth for delivering new housing and employment sites compared to other Tier 2 ‘main centres’ such as Axminster, Honiton and Sidmouth. Therefore, I do not support the assertion in the East Devon Local Plan Regulation 19 Publication Draft that Seaton is a Tier 2 “Main Centre’, as its obvious lack of services, job opportunities and growth potential due to its landscape constraints, means it is more aligned to being a ‘local centre’. As such, Seaton needs to be reclassified as a Tier 3 ‘local centre’ and its spatial strategy considered along the objectives of a ‘local centre’, including in relation to

reducing the amount of future housing development proposed in Strategy Policy SP03
'Housing requirement by Designated Neighbourhood area' (page 34).

Full name: David Morgan

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.: SP05

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.: Strategic Policy SP05: Development inside Settlement Boundaries (pages 41-42). Quote: “3.31. Settlement boundaries direct growth to areas that align with our plan objectives, providing clarity on where development is likely to be acceptable. This offers certainty to decision makers, local communities, landowners, and developers.” Comment: The definition of “settlement boundary” is not explicit or robust enough in its definition and therefore is potentially open to arbitrary interpretation/misinterpretation. Does ‘settlement boundary’ refer to the recognised parish boundary or to the built-up area boundary; the latter of which usually falls within the parish boundary? This lack of a rigid and robust definition could potentially create confusion for decision makers, local communities, landowners and developers in relation to identifying where future new development might/might not be permitted inside the “settlement boundary”. Therefore, the East Devon Local Plan must provide a robust definition in relation to what a “settlement boundary” is and how it relates to the context of the existing ‘parish boundary’ definition and ‘built up area boundary’ definitions.

Full name: David Morgan

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.: SP06

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.: Strategic Policy SP06:

Development outside Settlement Boundaries (page 42). Quote: “In locations outside of the defined settlement boundaries development will not be permitted unless it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development. This policy applies across the whole local plan area other than in the Cranbrook Plan area where it applies only to locations that fall outside of the Built-up Area Boundaries set out in the Cranbrook Plan.” Comment: As with Policy SP05, there is a lack of robust definition of what the term “settlement boundary” refers to. In the follow-on paragraph for Cranbrook, there is reference to the ‘built-up area boundary’. Therefore, does ‘settlement boundary’ refer to the recognised parish boundary or to the built-up area boundary; the latter of which usually falls within the parish boundary? This lack of a rigid and robust definition could potentially create confusion for decision makers, local communities, landowners and developers in relation to identifying where future new development might/might not be permitted outside of the “settlement boundary”. Therefore, the East Devon Local Plan must provide a robust definition in relation to what a “settlement boundary” is, to aid users’ understanding and how it relates to the context of the existing ‘parish boundary’ definition and ‘built up area boundary’ definitions.

Philip Morgan

Full name: Philip Morgan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of site EXMO_04a in the EDDC Local Plan is in contravention of Policy PB 03 - Protection of Irreplaceable Habitats and Features, as this site contains:

- Ancient Woodland, Ancient & Veteran Trees.
- Priority Habitats which support the functionality of Protected Species such as Bat Foraging, and Commuting Habitats, curlew nesting and foraging habitat.
- The northern section of the site provides a Commuting Habitat (Wildlife Corridor) linking Marley Hayes Woods, Marley Woods (Ancient Woodland) and the Pebblebed Heath - the maintenance of this Wildlife Corridor is essential in order to protect the extensive wildlife in this location and provide a buffer zone between the Pebblebed Heath and the developments in the south.

The 'Justification for Policy' is not being adhered to, which states: 13.10. Some habitats, including ancient woodlands and veteran trees, are irreplaceable due to their age, uniqueness, and biodiversity. Planning permission will not be granted for proposals that could harm these habitats unless there are exceptional reasons and a robust mitigation/compensation strategy, as per the NPPF. There are no exceptional reasons and a robust mitigation/compensation strategy does not exist and therefore this site EXMO-04a must be removed from the Draft Local Plan as per the NPPF.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: In accordance with Policy PB03 the site EXMO-04a should be removed from the EDDC Local Plan:

- Ancient Woodland, Ancient and Veteran Trees,
- Priority Habitats which support the functionality of Protected Species such as Bat Foraging, and Commuting Habitats, curlew nesting and foraging habitat.
- Wildlife Corridor or Commuting Habitat

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Planning permission for this site was refused in 2015 when the Woodland Trust objected and stated that Marley Woods in the NE section was Ancient Woodland and that The Lawn was Ancient Pastureland. Residents have expressed their feelings about this site at various meetings but their views have been ignored up to this point and EXMO-04a has been included in the Draft Local Plan. It is now time to re-assess this site and remove it from the Local Plan. The allocation in the plan is for 50 houses. The huge potential damage to the Biodiversity and Wildlife for the sake of 50 houses does not make sense. Please remove EXMO-04a from the Draft Local Plan before submission to the inspectorate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: David Morgan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Strategic Policy SD05: Seaton and its development allocations (pages 87-89). Support of the exclusion of Sites Seat_01, Seat_08 and Seat_10 from the East Devon Local Plan Regulation 19 as future development sites.

Site: Seat_01

I would like to support the decision that site Seat_01 has not been allocated as a future development site for housing or employment purposes in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'. The previous 'East Devon Local Plan (Regulation 18) – consultation feedback report – July 2023' (page 192), 'East Devon Local Plan Site Selection Report Seaton' (pages 8-13), and earlier 'Appendix 2: Site Selection – Interim findings at Tier One and Two Settlements' document (2022), as well as the decision of the Strategic Planning Committee at their meeting held on September 11, 2024, all came to the same conclusion in relation to site Seat_01 not being suitable as a future development site. As has already been identified for this site, Seat_01 is a Greenfield site with a rising character on the western boundary of the town. Its elevated character means that it can be seen from multiple viewpoints such as the South West Coastal Path, Axe Cliff Golf Club on the eastern boundary, the Area of Outstanding Natural Beauty (Strategic Policy OL02) to the east of it and from the top of Seaton Hole. Therefore, any development on this site would have an adverse impact on the topography and undeveloped skyline on the Western boundary of Seaton. Seat_01 also serves as an important fire break between the built up area and the adjacent woodland, which itself has no vehicular access point from Bunts Lane. Therefore extending the current built up area boundary to include Seat_01 would reduce this open

buffer as a protection. The site also provides a natural habitat for an abundance of different wildlife species and enables their movement to and from the neighbouring woodland in Bunts Lane. Seat_01 is also a well known corridor used by bats, being in the Beer Quarry & Caves Special Area Conservation zone. In summary, I continue to support the decision that site Seat_01 has not been allocated as a future development site for housing or employment, and for that reason, has not been included in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'.
Site: Seat_08

I would like to support the decision that site Seat_08 has not been allocated as a future development site for housing or employment purposes in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'. The previous 'East Devon Local Plan (Regulation 18) – consultation feedback report – July 2023' (pages 195-6), 'East Devon Local Plan Site Selection Report Seaton' (pages 32-37), and earlier 'Appendix 2: Site Selection – Interim findings at Tier One and Two Settlements' document (2022), as well as the decision of the Strategic Planning Committee at their meeting held on September 11, 2024, all came to the same conclusion in relation to site Seat_08 not being suitable as a future development site. As has already been identified for this site, Seat_08 is a Greenfield site with a rising character on the western boundary of the town. It is a highly exposed site on the skyline which can be seen from multiple viewpoints from the south and east, which includes an Area of Outstanding Natural Beauty (AONB; Strategy Policy OL02). Therefore, any development on this site would have an adverse impact on the topography and undeveloped, natural skyline on the Western boundary of Seaton. In addition, Seat_08 is in the Coastal Preservation Area (Strategy Policy OL03) and also shares a Landscape Character Type 2A in the East Devon Landscape Character Assessment. SEAT_08 also serves as an important fire break between the built up area and adjacent Couchill Coppice. The site also provides a natural habitat for an abundance of different wildlife species (some of which are protected species) and enables their movement to and from the neighbouring Couchill Coppice. Seat_08 is also a well known corridor used by bats, being in the Beer Quarry & Caves Special Area Conservation zone. In summary, I continue to support the decision that site Seat_08 has not been allocated as a future development site for housing or employment, and for that reason, has not been included in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'.

Site: Seat_10

I would like to support the decision that site Seat_10 has not been allocated as a future development site for housing in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'. The previous 'East Devon Local Plan (Regulation 18) – consultation feedback report – July 2023' (page 196), East Devon Local Plan Site Selection Report Seaton' (pages 43-45), and earlier 'Appendix 2: Site Selection – Interim findings at Tier One and Two Settlements' document (2022), as well as the decision of the Strategic Planning Committee at their meeting held on September 11, 2024, all came to the same conclusion in relation to site Seat_10 not being suitable as a future development site. As has already been identified for the site, Seat_10 is a Greenfield site on the western boundary of the town which is sensitively located on a steep slope. Its elevated character means that it can be seen from multiple viewpoints, which includes the South West Coastal Path, the top of Seaton Hole and elevated positions in Beer parish. Therefore, any attempt to build on it would have a negative impact on the natural landscape. The site is also a well known corridor used by bats (for foraging and commuting), being in the Beer Quarry & Caves Special Area Conservation zone, particularly as there is no overspill of light pollution into it because it is on the edge of the built up area. This, therefore, supports findings that site SEAT_10 is an important corridor used by various species of bats. In summary, I continue to support the decision that site Seat_10 has not been allocated as a future development site for housing, and for that reason, has not been included in the latest 'East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft (February 2025)'.

Full name: David Morgan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy SD05: Seaton and its development allocations (pages 87-89).

Comment: Re: Sites Seat_03 and Seat_05. I do not support the provision of housing for these sites given they conflict with a number of policies contained within the East Devon Local Plan. These include Policy OL05: Green Wedges (page 203) which states: “Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.” Strategic Policy OL01: Landscape Features (pages 196-197) states: “East Devon’s landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute to the character of East Devon’s landscapes, in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located.” Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty) (pages 199-200) states: “National Landscapes (Areas of Outstanding Natural Beauty) The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NLs) in East Devon: A) Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant). B) Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest.” Strategic Policy PB04: Habitats Regulations Assessment (pages 220-223) states: “Protection of Beer Quarry Cave SAC bat pinch points between Seaton and Colyford, and between Colyford and Colyton. In order to protect the pinch points and secure their long-term suitability for the SAC bat species, the council will not support

any applications which reduce the quality or functionality of the bat foraging and commuting habitats within these pinch points, such as through hedgerow\tree loss and adverse impacts from lighting”. In addition, Transport Policy TR01 (pages 183-184; Paragraph 11.5) refers to “Exmouth, Honiton, Seaton, and Ottery St Mary having bespoke bus services, with several high-frequency routes linking East Devon settlements to Exeter”, as ‘Justification for Policy’. However, the Justification for Policy TR01 fails to recognise there are disparities in this ‘broad brush’ assumption. Towns such as Seaton have no bus services serving the town from Exeter after 7:05PM for six days of the week, (6:05PM on Sundays), whereas Exmouth, Honiton and Ottery St Mary do. Nor is there a bus service from Axminster to Seaton after 6:30PM for six days of the week, (Mondays to Saturdays), and no bus services on Sundays, to provide a link with Axminster’s railway station. There is also no bus service from Honiton to Seaton after 5:50PM for seven days of the week, to provide a link with Honiton and its railway station. Policy TR01 does not take into account there is no early morning bus service from Seaton (before 8am) on Saturdays and Sundays to any destinations, including Axminster, Sidmouth, Honiton and Exeter, all of which are major hubs for employment, medical facilities, leisure and recreational activities. Moreover, Sunday services are also limited from Seaton, with just one bus route (the 9A) operating to provide a connection with Sidmouth and Exeter. Unlike Exmouth, Axminster and Honiton, Seaton does not have a supplementary railway to provide further travelling opportunities on public transport. Therefore, Transport Policy TR01’s ‘broadbrush’ assumption that each town has a comparable level of “high-frequency routes linking East Devon settlements to Exeter” is incorrect and therefore must be disregarded in relation to suggesting it meets the needs of residents living in Seaton and the surrounding parishes. Policy OL10: Development on High Quality Agricultural Land (page 209) looks to, A) “Restrict development on the best and most versatile agricultural land (Grades 1, 2, and 3a) unless there is an overriding need and no suitable lower-grade land is available”. It is clear that the sites Seat_03 and Seat_05 are both high quality and versatile use agricultural land. Therefore, they should not be use for housing allocation. Strategy 23 for Seaton in the emerging East Devon Local Plan, 2020 to 2040, Preferred Options Reg. 18 Consultation Draft Plan (Current draft - autumn 2022), (page 81, Paragraph 6.45) also states: “The population and range of community facilities and services in Seaton make it an appropriate place to locate a relatively large amount of housing and employment development”. However, as already demonstrated through the aforementioned policies, Seaton offers a more restricted level of infrastructure compared to every other Tier 2 towns in East Devon. Therefore, taken alongside the additional constraints of Seaton’s topography and other valued landscape characteristics, this does not justify the number of new housing and employment sites being proposed.

Therefore, I do not support the recommendation in the East Devon Local Plan Regulation 19 Report that Seaton should be considered a Tier 2 town able to deliver 522 new dwellings up to 2040 (Strategy Policy SP03; pages 32-35). Especially when considered in comparison with Sidmouth and the Sid Valley with its greater infrastructure, including more primary and secondary schools provision, more shops, all weather recreational facilities, and with a more active community hospital, is required to deliver 471 new dwellings for the same period. This would suggest that Sidmouth and the Sid Valley is actually far better placed to support an increase in their respective housing allocation beyond 471 new dwellings rather than utilise sites Seat_03 and Seat_05 in Seaton.

Full name: David Morgan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Page 3, Paragraph 2. Quote: “This Local Plan, guiding development in East Devon through to 2042, aims to preserve and enhance these distinctive qualities. While government policy necessitates the allocation of land for housing and employment, our focus remains firmly on ensuring development is balanced, sustainable, and beneficial to our communities. This Plan is underpinned by principles that seek to protect our outstanding landscapes and wildlife while fostering vibrant, inclusive communities.”

Comment: Unfortunately, this latter point cannot be evidenced or supported in relation to protecting the large green wedge site between Seaton and Colyford. As well as being an outstanding landscape, the site supports biodiversity and provides an important foraging site for an abundance of nationally protected wildlife species, such as bats. The site also meets various farming practises in relation to encouraging localised food production, which is more sustainable and also delivers a reduced carbon footprint through reduced transportation requirements compared to sourcing a comparable alternative food source, either nationally or importing it.

Full name: David Morgan

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(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.: Strategic Policy HN02: Affordable housing (pages 129-130).

Comment: The strategy for this policy does not provide a robust enough commitment to delivering affordable housing provision in Tier 2 towns. Historically, this flexible approach has resulted in many Tier 2 towns missing out on affordable housing provision because there has either not been sufficient commitment by the Local Planning Authority to enforce it, or there has been acceptance of alternative of funding being provided by a house building developer for off-site provision of new affordable housing. Unfortunately, this latter approach does not adequately answer the obvious question of 'where will this affordable housing be accommodated', or whether it will continue to be provided in that same settlement. Many large schemes, such as in Seaton, have not seen affordable housing materialising, or there has been a reduction in the percentage of affordable housing delivered. Neither approach is acceptable, with greater commitment needed by the Local Planning Authority to actively ensure it is delivered in communities where new build developments are taking place.

Full name: David Morgan

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?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

9.1

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.: Page 3, Paragraph 3. Quote: “Key to this vision is our commitment to delivering genuinely affordable housing and implementing strong measures to reduce carbon emissions both during construction and throughout the operational lifespan of new developments. We also aim to exceed government requirements for biodiversity enhancement and set out a comprehensive strategy to support thriving town centres, robust community facilities, and opportunities for local businesses to flourish.”

Comment: This approach to “support thriving town centres” suggests that effort to “support” will only be provided to town centres that are already identified by the methodology used for the East Devon Local Plan as “thriving”. It does not suggest initiatives will be identified, considered and implemented to try and support other town centres that are struggling rather than thriving, such as coastal towns and those with poor infrastructure. If the approach of the emerging East Devon Local Plan is to try and support all town centres to thrive, then the wording of this sentence needs to be adjusted to read as: “We also aim to exceed government requirements for biodiversity enhancement and set out a comprehensive strategy to support all town centres to enable them to thrive, and advocate robust community facilities and opportunities for local businesses to flourish.”

Digby Morrison

Full name: Digby Morrison

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.: OL09

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.: This policy is a carbon copy of the previous plan policy EN14 (other than the addition of the need for a CEMP) which has failed to ensure that permission is not granted for development which has resulted in unacceptable levels of pollution in the Exe Estuary and the sea, in coastal towns and villages in East Devon.

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape 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 new plan needs new policies or more robust drafting of the proposed policy and new enforcement measures to deal with this acknowledged issue.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: this policy is not sound because further evidence should have been sought and used to develop more robust policy and enforcement to deal with the issue of new housing developments being built without the required waste water infrastructure to ensure permission is not granted for development which will result in unacceptable of pollution to the Exe Estuary and the sea at coastal towns and villages in east devon

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter 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 Landscape chapter sound. It will be 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 new plan needs new policies or more robust drafting of the proposed policy and new enforcement measures to deal with this acknowledged issue.

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as

precise as possible.: I don't know. I haven't read any details of the collaboration the council has entered into with other councils on this. But it is clear that sufficient collaboration with South West Water has not been entered into

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate 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 further reinforce the point that this policy is not legal, justified or effective

Full name: Digby Morrison

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

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: I don't know if it's legal. The commonplace platform doesn't describe what constitutes legal compliance. It simply names the acts and regulations that describe this. Hardly accessible for anyone other than a chartered planner to be able to comment on legality of the plan when the parameters of legality have not been described!

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.: Policies SP07 & 08 are not Effective. They are too weak and general to ensure that sufficient and adequate waste water treatment infrastructure is in place before homes are occupied. Policies SP07 & 08 are also not Justified. To date development has continued without the commensurate upgrading of waste water treatment infrastructure, when combined with more regular significant rainfall events, this has resulted in increased overflows of sewage into the Exe Estuary and the sea. Evidence of housing being built ahead of waste water infrastructure, or more regular significant rainfall events has not been included in the development of the plan and no work has been conducted to establish policies and plans which would mitigate this issue. The only waste water project mentioned in the East Devon Local Plan Infrastructure Delivery Plan is UI-5 Investment at Countess Wear Sewage Treatment Works to increase capacity for growth. There is no mention of the waste water pollution issued in Exmouth (or any other coastal towns and villages) and investment required to resolve these before further housing is developed.

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.: Further work needs to be conducted on this issue, included in the

evidence, and policies redrafted to make them more specific and robust on this topic of waste water infrastructure and pollution.

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

I don't know, I haven't read any description of the collaboration entered into with other councils.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:

Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. :

To more specifically represent the lack of evidence and weakness of policy wording.

Full name: Digby Morrison

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

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: I don't know if it's legal. The commonplace platform doesn't describe what constitutes legal compliance. It simply names the acts and regulations that describe this. Hardly accessible for anyone other than a chartered planner to be able to comment on legality of the plan when the parameters of legality have not been described!

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.: Policies SP07 & 08 are not Effective. They are too weak and general to ensure that sufficient and adequate waste water treatment infrastructure is in place before homes are occupied. Policies SP07 & 08 are also not Justified. To date development has continued without the commensurate upgrading of waste water treatment infrastructure, when combined with more regular significant rainfall events, this has resulted in increased overflows of sewage into the Exe Estuary and the sea. Evidence of housing being built ahead of waste water infrastructure, or more regular significant rainfall events has not been included in the development of the plan and no work has been conducted to establish policies and plans which would mitigate this issue. The only waste water project mentioned in the East Devon Local Plan Infrastructure Delivery Plan is UI-5 Investment at Countess Wear Sewage Treatment Works to increase capacity for growth. There is no mention of the waste water pollution issued in Exmouth (or any other coastal towns and villages) and investment required to resolve these before further housing is developed.

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.: Further work needs to be conducted on this issue, included in the

evidence, and policies redrafted to make them more specific and robust on this topic of waste water infrastructure and pollution.

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

I don't know, I haven't read any description of the collaboration entered into with other councils.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:

Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. :

To more specifically represent the lack of evidence and weakness of policy wording.

Full name: Digby Morrison

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Lymp_07 is in Lympstone Parish Boundary but was consulted on as an Exmouth site. This failed to highlight to Lympstone residents a site which they would have wanted to respond to consultation on and therefore the site, and policy have not been properly consulted on. The rushed final councillor meetings to select the sites to include in the plan, when they came back to sites that had been previously moved on from, to make up the full required number of houses, put Lymp_07 as the first site to consider. Sites considered earlier in the meeting were clearly more likely to be selected under the time pressure and pressure for numbers that councillors were. Sites should have been considered with the least suitable or least preferred considered last in the meetings and the 'easier' less controversial sites considered first. So that councilors could consider less suitable sites later in the meeting, and be able to decide on these sites in full knowledge of how many more houses they needed to find. therefore being able to not allocate controversial sites that were not required to make up the numbers. The process followed, of considering Lymp_07 first has resulted in this site being selected in preference to far more suitable and less controversial sites.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The final site selection meeting needs to be re-run in order to conduct a more fair site selection only considering less suitable and more controversial sites, towards the end of the meeting if housing numbers are still required.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

In the same way that I believe the plan is not legally compliant, because the site selection process was flawed, I also believe the plan is not justified. The selection of Lymp_07 is not appropriate when compared to the other site options you could have chosen. Lymp_07 is in Lympstone Parish Boundary but was consulted on as an Exmouth site. This failed to highlight to Lympstone residents a site which they would have wanted to respond to consultation on and therefore the site, and policy have not been properly consulted on. The rushed final councillor meetings to select the sites to include in the plan, when they came back to sites that had been previously moved on from, to make up the full required number of houses, put Lymp_07 as the first site to consider. Sites considered earlier in the meeting were clearly more likely to be selected under the time pressure and pressure for numbers that councillors were. Sites should have been considered with the least suitable or least preferred considered last in the meetings and the 'easier' less controversial sites considered first. So that councilors could consider less suitable sites later in the meeting, and be able to decide on these sites in full knowledge of how many more houses they needed to find. therefore being able to not allocate controversial sites that were not required to make up the numbers. The process followed, of considering Lymp_07 first has resulted in this site being selected in preference to far more suitable and less controversial sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The final site selection meeting needs to be re-run in order to conduct a more fair site selection only considering less suitable and more controversial sites, towards the end of the meeting if housing numbers are still required.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

I don't know. I haven't found any description of the co-operation with other councils.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:

Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

to clearly articulate and represent the views I have expressed that the conduct of the final site selection meetings was flawed

David Mountain

Full name: David Mountain

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(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.: I, like the majority of respondents, have no experience of the legality of urban planning proposals so I, like most respondents will be unable to provide meaningful feedback to this survey as set up.

That does not mean I and others to not have meaningful feedback to provide.

I live in Lymington which currently has a population appropriate for its infrastructure and character. To increase its housing and associated population by more than 25% will fundamentally change the character and erode the character. It will cease to act as a distinct village, and instead become a suburb of Exmouth. With the current population the road and sewage/sewerage systems function reasonably well. Many roads lack pavements, but with the current car and pedestrian capacity, all road users respect each other and can accommodate waiting at pinchpoints. Increase this by 25% without associated road infrastructure improvements, and Lymington will grind to a halt at peak times. Likewise we have had plenty of sewerage spill incidents recently - increasing the population (water use / more run off) without a huge investment in sewerage will lead to use further outstripping capacity.

Richard William Mulholland

Full name: Richard William Mulholland

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.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

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.: The green space, both the wedges and the Culme Valley Park around West Clyst needs to be maintained in its entirety, otherwise we will lose the special nature of the area (including it's bio diversity).

Your process does not make it easy to lodge such feedback in the right place, so it's included here for you to place appropriately.

4. Do you consider that this part of the Development at the West End 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)

Helen S MUNDAY

Full name: Helen S MUNDAY

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?:

Yes

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.:

1. Scrutiny of applications of plans at local plan stage is insufficient. To illustrate; the submissions for the local plan were discussed by the planning committee over a few days/number of hours. At the end of this process, when insufficient developments had been approved to meet targets, more developments that had been rejected at first consideration were added in. At this stage little detail of the developments are available and committee members seemed to use their 'local knowledge' and 'gut feel'. However, when plans come forward for outline planning permission, the decision is invariable to go ahead as the development 'is in the local plan'. This means that many developments will be approved on the basis of little evidence-based scrutiny at local plan stage and effectively have to prove the inappropriateness of the initial approval, which is not surprisingly an uphill struggle. Surely plans should all be thoroughly scrutinized at the point where they are given initial approval which appears to be at local plan stage, as this has become so critical in the overall evaluation process. The opinion given at outline planning stage, is 'if it is the local plan it is happening', this cannot be a fair and appropriate way to evaluate plans, given the current set up. On this basis, the process of evaluation of what will be included into the local plan, needs a major revamp, if in effect it 'green lights' an application through the latter process. I.e. the current evaluation of submissions to the local plan is not fit for purpose and it is unclear how applications that did not meet the local plan timing window are then approached.

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.: If the level of scrutiny at local plan stage is not increased e.g. insufficient details are available, then the assumption that ‘if it is the local plan it is happening’, needs to be replaced with one that effectively says ‘whilst initial high-level evaluation has led to inclusion in the local plan, thorough scrutiny at planning permission stage is able to either give the go-ahead for plans or reject plans based on detailed evaluation’.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I have examples of lack of soundness that I can present if helpful

Full name: Helen S MUNDAY

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.: OL02

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.:

5. Protected landscapes have to be appropriately respected. Submissions to build within an area under a National Landscape designation, should immediately bring into question such applications, especially for large scale developments. Ignoring the protections that the National Landscape designation is designed to guarantee, not only diminishes the value of such schemes and could certainly bring legal challenges to East Devon Council, which would be a waste of time and expensive. Such designations should be a valid reason for rejecting applications and used with confidence that there is a legal basis for doing so. Legislation applying to National Landscapes has recently been updated and strengthened and the Local Plan does not respect this change. As it stands the local plan is not legally compliant with the designation of National Landscapes. Specifically, section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023, which now requires all public bodies to 'seek to further' the purposes of protected landscapes. Only local authorities or the Secretary of State can give permission for development in, or affecting, an AONB. As a local authority, EDC must make sure that any proposals seek to further the purpose of conserving and enhancing the natural beauty of the AONB, for example when adding utility services, such as gas pipes and telecommunications cables or creating public access as part of rights of way improvement.

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape 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 policy needs to accurately reflect the current legislation to conserve and enhance the natural beauty of

the AONB. It should specify what this means in practice and give examples. It should be clear that adherence to the law must be explicitly discussed during local plan deliberations and if there is any doubt about the ability of a submission to enhance the landscape then such plans should not be included.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: See comments in legality section

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I can give examples of where this policy is not being legally complied with.

Full name: Helen S MUNDAY

Proposal: 15. Our Outstanding Historic Environment

1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 15

2. Do you consider that this part of the Our Outstanding Historic Environment chapter is legally compliant?: Yes

3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?: No

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.:

2. Scrutiny of planning permissions of individual developments that impact listed buildings/areas of special value are to be welcomed. Historical features can't be recovered once lost. However, it is surprising that larger developments that have a significant impact on such buildings/features seem to be less well scrutinized. For example, in Sidbury, many planning applications for individual family homes that are submitted are rejected. However, the application Sidm_34 which is not directly associated with an individual listed building e.g. Grade II listed Furzehill Farm, will have a significant negative impact on this listed building and many other buildings of historical significance. The scrutiny of individual listed building applications is pro rata much higher than for much larger developments. This cannot be a sound way of protecting local assets. In the above example it could be expected had Furzehill Farm requested planning permission for a small house within their curtilage, it would have been rejected. However, a plan for 43 houses, in a plot immediately adjacent to that land has been included in the local plan. This is not a consistent approach to preserving areas of significant character in the area.

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.: Scrutiny of larger developments should be significantly increased to that shown to plans to individual buildings and should be tested according to the criteria - if this were an application for an addition to a listed building in a historic environment would it be approved.

4. Do you consider that this part of the Our Outstanding Historic Environment chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I have examples I can present if this helpful.

Full name: Helen S MUNDAY

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

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.:

4. 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.

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.: 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.

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)

Full name: Helen S MUNDAY

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

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.:

3. Some sites should simply not be included in the plan due to multiple and cumulative factors that make the site both economically and physically inappropriate for development. Steep sided valleys with heavy clay soils, difficult natural drainage, poor access and various other natural and manmade issues, should simply be discounted as sites that warrant development. Especially where the impact on existing properties e.g. lower down the hillsides, would be significant in a negative way.

The local plan should be bold enough to state that some areas are already at realistic capacity for economic and practical further development due to the nature of the environment e.g. steep sided valleys. In these cases, housing quotas imposed by central government/high authorities, are irrelevant and need to be challenged as to their appropriateness.

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.: Certain areas should be 'blocked out' from the local plan as they are inappropriate for further significant development. Small ad hoc developments may occur in due course, but not be part of priority allocation.

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)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : I have examples that I would be happy to share

Full name: Helen S MUNDAY

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

7. The guidance on the consultation document states that the plan should be 'deliverable not aspirational'. The principle of potential for 'economic development' seems to be lacking in planning considerations. The Sidbury business park, seems a case in point, when years after approval, no developer has come forward to purchase and develop the land as a business park. There is a risk that 'history will repeat' with plan Sidm_34. In this case, numerous consultees have expressed concerns about the development, e.g. requiring archaeological digs before commencement, significant upgrading of drainage plans, negative impact on the AONB and the overall adverse nature of the site in a steep sided valley. Not only is there a risk that it will be a challenging site to develop, but that it will not be economical to do so. If approved the Council will no doubt 'tick off' 43 houses from their quota. However, this is totally disingenuous, if the land is never actually developed. The Council is delusional about their plan if applications will never result in the building of much needed homes, and should only include in the local plan, those cases that can be considered economically viable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The definition of what constitutes 'deliverable' should be set out. A discussion of economic viability should be explicitly discussed at local plan stage.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Helen S MUNDAY

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.: AR01

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?: 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.:

6. Submissions for planning should not only consider the impact on the development itself but also the wider community. They should also be informed by likely climate change impacts. For example, in Sidm_34, the developers state that the risks from flooding to occupants of the new houses would be very low. However, they fail to state that the risk to surrounding houses would be very high, as run off from the development would be discharged onto the A375 which already has frequent flooding events, and into the Mill Leat which is already at capacity during normal rain event, never mind the intensity of rain events that are predicted to occur. Weather records indicate that the amount of annual rain is increasing and the occurrence of severe weather events such as extremely heavy rain is increasing. Plans need to recognise this evidence and also respond to forward climate patterns.

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.: Plans need to be informed by the climate change predictions by organisations such as the Exeter based Met Office. Flood risks are increasing, are extremely stressful for those who now find themselves in flood risk areas (even if they were not historically) and includes the risk of surface water, and coastal flooding as well as rising river levels. New developments should not make a rising tide of risks even more extreme for those in the vicinity of such developments and should not be permitted.

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Helen S MUNDAY

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.: AR01

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?: 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.:

Submissions for planning should not only consider the impact on the development itself but also the wider community. They should also be informed by likely climate change impacts. For example, in Sidm_34, the developers state that the risks from flooding to occupants of the new houses would be very low. However, they fail to state that the risk to surrounding houses would be very high, as run off from the development would be discharged onto the A375 which already has frequent flooding events, and into the Mill Leat which is already at capacity during normal rain event, never mind the intensity of rain events that are predicted to occur. Weather records indicate that the amount of annual rain is increasing and the occurrence of severe weather events such as extremely heavy rain is increasing. Plans need to recognise this evidence and also respond to forward climate patterns.

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.:

Plans need to be informed by the climate change predictions by organisations such as the Exeter based Met Office. Flood risks are increasing, are extremely stressful for those who now find themselves in flood risk areas (even if they were not historically) and includes the risk of surface water, and coastal flooding as well as rising river levels. New developments should not make a rising tide of risks even more extreme for those in the vicinity of such developments and should not be permitted.

4. Do you consider that this part of the Adapting to Climate Change 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)

Dr Robert Murdoch

Full name: Dr Robert Murdoch

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?: Yes

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.: EXMO 20 is a rural development based around the B3179 with no public transport along that section or indeed St Johns Rd. Public transport access would need to be enhanced. Car access to B3179 would be dangerous from the proposed development as this follows the national speed limit

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Dr Robert Murdoch

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.: OL02

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: Yes

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: P201 National Landscapes 12.6. EXMO 20 is considered a major development and therefore only permitted in exceptional circumstances The case for this being exceptional is weak and should not be permitted. It should also be seen in the context of the other EXMO projects which deliver hundreds if not thousands of homes. Exmo 20 is the size of a medium to large village with none of the benefits

4. Do you consider that this part of the Our Outstanding Landscape 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)

Mrs Lisa Murdoch

Full name: Mrs Lisa Murdoch

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site contrary to PARAGRAPH 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Dr Robert Murdoch

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO20 as a site for 700 homes representing an increase in population of over 2000 people on the edge of the Pebblebed heath is unacceptable. This is encroaching within the 400m limit to development of the SPA SAC and NNR. The strategy for almost linking this development with Goodmoors will significantly alter that whole ecosystem. There has been no wildlife survey done thus far as mature woodland, grassland and open field will support a huge diversity of flora and fauna which will be eroded. It is also ill considered when it comes to access. The B3179 from the Ting Tongs is an accident black spot and the road heading to Woodbury has a 60 mile limit making right angle access dangerous.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo 20 will be a development of 100 houses situated along St Johns Rd so as not to encroach on virgin farm land or encroach on non permitted areas adjoining Pebblebed heaths.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

David Murphy

Full name: David Murphy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

In addition to the above, I do not believe that the planners and developers have demonstrated that this planned development has or will meet the criteria as set out, for it to qualify as "in exceptional circumstances".

Victoria Murphy

Full name: Victoria Murphy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to share my concerns with regards the local plan for East Devon and, more specifically the allocation of Whim_08, potential allocation of land next to Brantley Gardens for development.

I would like to confirm that I agree with Whimble Parish Council's challenges to the policy and would like to echo their concerns. Please take it as written that those concerns are included as part of this submission without the need for duplication here.

In particular I have significant concerns over the traffic levels and road safety in Whimble as it stands already and consider Church Road to already be dangerous to turn out on to from Hindstrete, Dince Hill and Bramley Gardens. Any proposed developments would exacerbate this, making the village unsafe for children and animals (there are already a lot of pets and wildlife falling victim to the road as it is). The comments in the Parish Council's response with regards pavement safety are wholeheartedly supported.

Whimble is currently an example of an attractive village with a nice community, adequately supported by services for the people living here but would not be able to support further developments to any real degree (eg via the school and village shop). Other sites are more appropriately serviced following recent development eg Cranbrook.

Without prejudice to the above challenge, in the event that the site was allocated the following must be noted:

- the proposed allocation site is home to a sewerage treatment plant for a number of houses and consideration would need to be given to how this would be dealt with: going on to mains sewerage is exceptionally expensive and not feasible for the properties in question; and

- any development should be made at a reasonable distance from the properties on Hindstrete and Bramley Gardens to allow continued enjoyment of those properties which currently sit on the edge of the Green Wedge.

Frances Mutter

Full name: Frances Mutter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I do not have the appropriate qualifications or knowledge to comment on this section.

But I do believe that previous comments, emails, and petitions from residents was not taken into considerations as it was not submitted via Common Place.

I understand that these vital public comments were not reported by EDDC to the Strategic Planning Committee, therefore ignoring the opinions of the locals in Feniton.

EDDC's preferred method of commenting is the Common Place System. It is complicated and very time consuming effectively putting people off locals trying to put their point across. This could be argued to be discriminatory and undemocratic and contravenes British Values.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It is well known that Feniton (the new and old village) floods regularly – properties and roads. I live in old Feniton where the 'road' to get out of the village floods and can be impassable, that is if we can even get out of the old village due all the surface water running like a river down to the old village. There have been occasions where we can't even get the car out of the drive due to level of the water. On these occasions, I have waded with wellington boots, up through the torrent of water coming down Broad Lane (which is unsafe to walk through as it is so deep and fast flowing and cars trying to get

out the village) to try and catch the train. But the train service is unreliable and when it is so wet, the trains are cancelled. The new flood relief scheme in the new village is only going to serve the volume of houses that are currently there now, not any more. In the old village, we are waiting for a similar relief scheme. More building will only make the situation much worse with regards to flooding and with more commuters not being able to get to work.

I have been here 10 years and in this time, I have stopped trying to walk around the lanes due to the increased volumes of traffic and size of vehicles. I note that on Plan 19, pavements will be built with cycle lanes – great idea but where are the Council going to have room as there is not even room for 2 cars to get by each other let alone a pedestrian. You take your life in your hands if you try to go for a walk. I know dog walkers who have to put their dogs in their cars and drive them out of the village to give them a walk as it is so unsafe. And the Government promotes increasing exercise in the great outdoors – not in Feniton!

How is the sewerage issue going to be addressed? The sewerage system is not fit for purpose with SWW collecting sewerage but faecal matter often seen in the road or in people's garden or home. A lovely advert to come and buy a new home in Feniton!

The public transport here is terrible. I have already alluded to an unreliable train service, even when there is not poor weather, I gave up trying to commute into Exeter as the service was so unreliable. The bus service is also not frequent or fast enough and doesn't cover and wide enough area.

Schools/medical centres/dentists all over subscribed and cannot cope.

Does Feniton really need this volume of houses when Cranbrook, which is so close to us, will be expanding from 3000 to 8000 houses and has the infrastructure already there?

Employment Site Otry_20 is not needed here.

It is in a totally unsafe location and The access is on a single track lane, blind bends, no pavements. It would be totally unsafe to build this here and the increased traffic along Ottery Road, and on Green Lane makes no sense at all. Ottery Road also floods and can be impassable. It also seems totally out of proportion for a village setting. Please reconsider this.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I am not against increased housing but the issues I have addressed need to be rectified first. There should be a substantial reduction in the number of houses allocated for Feni_08 and the Removal of Otry_20 from the draft local plan, please. Thank you for reading this.

Lucy Neal

Full name: Lucy Neal

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Too many homes for the size of village: Broadclyst should not be considered a Tier 3 settlement.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Broadclyst should not be considered a Tier 3 settlement.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Broadclyst cannot support a development of this size. Key issues: * Doctors surgery cannot cope with any additional patients as it is already at capacity. * Primary school is oversubscribed and cannot take additional students. Any children from this development will either have to travel further afield, or it will push other children from nearby areas into other schools which also do not have space. * Access routes to this development are along small roads. In particular the access to here from the A30 would be via a very small back lane to Cranbrook which is not well maintained, has a significant number of potholes and very few passing places. * This land often floods or is

waterlogged over winter * The sewage system cannot fully cope with existing housing without adding additional. * There are no footpaths from here to either primary, or secondary schools. The route to the secondary school in particular is alongside a dangerous road which is unlit.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Broadclyst cannot support a development of this size. Key issues: * Doctors surgery cannot cope with any additional patients as it is already at capacity. * Primary school is oversubscribed and cannot take additional students. Any children from this development will either have to travel further afield, or it will push other children from nearby areas into other schools which also do not have space. * Access routes to this development are along small roads. In particular the access to here from the A30 would be via a very small back lane to Cranbrook which is not well maintained, has a significant number of potholes and very few passing places. * This land often floods or is waterlogged over winter * The sewage system cannot fully cope with existing housing without adding additional. * There are no footpaths from here to either primary, or secondary schools. The route to the secondary school in particular is alongside a dangerous road which is unlit.

This should be modified to reduce the allowed total number of housing to enable the village to support the new number of housing and at a lower density.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Broadclyst cannot support a development of this size. Key issues: * Doctors surgery cannot cope with any additional patients as it is already at capacity. * Primary school is oversubscribed and cannot take additional students. Any children from this development will either have to travel further afield, or it will push other children from nearby areas into other schools which also do not have space. * Access routes to this development are along small roads. In particular the access to here from the A30 would be via a very small back lane to Cranbrook which is not well maintained, has a significant number of potholes and very few passing places. * This land often floods or is waterlogged over winter * The sewage system cannot fully cope with existing housing without adding additional. * There are no footpaths from here to

either primary, or secondary schools. The route to the secondary school in particular is alongside a dangerous road which is unlit.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Patryk Nelkowski

Full name: Patryk Nelkowski

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Additionally the extra home would place an increased strain on the surrounding infrastructure. From healthcare, and emergency services to roadways and schools.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Michael Newby

Full name: Michael Newby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To voice my strong objection to the plan on the grounds that it will gravely damage the natural environment in St John's Road leading to the Pebblebed Heaths, to the rural setting of this area of Exmouth, and to the peaceful location of the church of St John in the Wilderness. It will cause noise and light pollution. It will impossibly increase traffic on a narrow road. It will cause irreparable damage to this precious part of Exmouth, spoiling part of the town's 'green lung' and, in the process, eroding the offer it makes to one of Exmouth's principal income streams - tourism. People come here for the combination of seaside and unspoiled green environment and not to visit another housing estate.

David Newman

Full name: David Newman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO 20 is closest to Budleigh which does not have the resources to support it. In effect this joins Budleigh and Exmouth contrary to Policy OL05. Exmo20 will have environmental impacts contrary to policy HE02 and OL01 OL09 PB04. Would increase flooding risk AR01B and pollution which is out of control. There is no public transport and the road isn't suitable contrary 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.: Reduce size and no access via B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mark Nicholls

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan lacks clarity and legal certainty regarding land contributions. The proposal involves multiple parcels of land across separately owned areas, some of which have not yet been agreed upon by the landowners. Additionally, areas designated for key community facilities such as the community hub, school, and common areas are included on the original plans, despite not being available for development. Without legally binding agreements in place, the application may be deficient and fail to meet the requirements of Section 106 of the Town and Country Planning Act 1990, particularly regarding the necessary contributions for infrastructure and affordable housing. This lack of secure land agreements undermines the soundness of the plan.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in clear conflict with paragraph 11.2 of the Local Plan, which advocates for the concentration of significant development in areas that minimize travel distances, reduce reliance on private vehicles, and promote sustainable transport choices. Exmo_20 is situated in a location that will inevitably increase travel needs, necessitating the use of cars for even the most basic journeys. The housing is proposed to be at the southern end of the site, while the primary vehicular access point is located at the very northern edge, adjacent to the protected Pebblebed Heaths (SAC/SPA/SSSI). Due to the mandatory 400-meter buffer zone around these ecologically sensitive areas, no housing can be constructed within the top 400 meters of the site. This restriction creates a minimum of a 0.5 km drive just to reach the residential areas from the site entrance. This means that for every journey, residents will have to drive at least 1 km within the site itself just to get from the entrance to the housing. This unnecessary internal driving will increase overall car dependency and is incompatible with the objectives of the Local Plan, which seeks to reduce the environmental impact of transportation.

The situation is further exacerbated by the need for residents to drive an extended route to access Exmouth town center. From the B3179 site entrance, residents must drive around the edge of Exmouth and back down into the town center, covering a distance of 4.0 to 4.3 miles. This longer route will make daily travel to and from the town center more time-consuming, inefficient, and car-dependent. Given that Exmo_20 is located far from the town center and essential services, this development will likely result in a significant increase in the number of car journeys, which will further contribute to traffic congestion, pollution, and the carbon footprint of the area.

This development's location is at odds with the strategic aims of paragraph 11.2 of the Local Plan, which advocates for development that minimizes the need for travel, particularly by private car. The long distances and lack of immediate access to services make walking, cycling, and public transport impractical options for most residents. While the Local Plan encourages developments that promote more sustainable travel options, the design and location of Exmo_20 will inevitably increase the number of car trips, generating greater road traffic and undermining any efforts to reduce the environmental impact of transportation.

Additionally, the proposed development will further marginalize individuals without access to private vehicles, exacerbating social exclusion by isolating residents from essential amenities and services. The lack of alternative transport infrastructure, coupled with the increased reliance on cars, will make it difficult for non-car owners to access work, school, healthcare, or recreational facilities, creating a greater divide between those who can afford a car and those who cannot. This not only undermines the sustainability goals of the Local Plan but also threatens to exacerbate social inequality and limit the ability of residents to fully participate in the community.

In conclusion, the allocation of Exmo_20 fails to meet the objectives set out in paragraph 11.2 of the Local Plan, which advocates for sustainable development that reduces travel needs and minimizes reliance on cars. The site's location and design will increase car dependency, generate additional traffic, and marginalize non-car owners, all of which are in direct opposition to the principles of sustainable development outlined in the Local Plan.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in clear conflict with policy TR01 of the Local Plan. Due to the significant distance between this site and essential services such as shops, workplaces, and schools, walking or cycling will not be the preferred mode of transport for residents. Research cited in the Local Plan indicates that most people prefer to walk to their destinations if they are within 0.5 miles. Beyond 1 mile, cars become the dominant mode of transport, and at distances greater than 2 miles, trips made on foot are rare. Exmo_20 is located far beyond the 0.5-mile or even 1-mile thresholds, making walking or cycling an unrealistic option for most residents when accessing daily necessities. As such, these sustainable modes of transport cannot be relied upon as the primary means of travel for the majority of the population.

Even if walking routes, cycle paths, or public transport options were introduced, they would have minimal impact on reducing the number of car journeys generated by this development. The steep local topography, combined with the considerable distances to essential infrastructure and services, further exacerbates the difficulty of walking or cycling. The landscape's natural incline and the lack of nearby facilities make these alternatives unfeasible for the majority of residents. As a result, the development is likely to generate a high volume of car traffic, which would add to congestion and further undermine the Local Plan's aims for sustainable travel.

Additionally, the site's location presents a significant challenge for individuals without access to a car. The distance from essential services, combined with the lack of viable transport options, could lead to social exclusion for those who are reliant on public transport or walking. For these individuals, the isolation of Exmo_20 from key amenities would limit their ability to engage in daily activities, such as shopping, work, or school

runs. The development would therefore not only increase car dependency but also marginalize residents without cars, undermining the social inclusivity that should be a priority for any new development. In summary, the allocation of Exmo_20 does not align with the objectives of policy TR01, as it will create a car-dependent community and exacerbate social exclusion for vulnerable groups.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in direct conflict with paragraph 13.9 of the Local Plan. According to the National Planning Policy Framework, ‘irreplaceable habitats’ are defined as habitats that are extremely difficult, or take an extended period of time, to restore, recreate, or replace once destroyed. The development of Exmo_20 would result in the loss of such irreplaceable habitats. The site contains a significant number of mature trees, many of which display signs of veteranisation. These trees are crucial for providing unique microhabitats that support a wide range of species. Their loss cannot be compensated simply by planting new trees, as these mature trees have established complex ecological roles that take decades, if not centuries, to replicate.

In addition to the trees, Exmo_20 is home to numerous long-established hedgerows that traverse the site, some of which stretch over considerable lengths. These hedgerows, along with the mature trees, contribute to a highly biodiverse environment, offering essential habitats and functioning as wildlife corridors. While it may be possible to leave spaces around some of these features, the overall degradation and fragmentation of the habitats they provide is unavoidable with the proposed development. The impact on biodiversity would be significant, and these natural features cannot be easily replaced or restored.

Furthermore, the site lies within an identified ‘Strategic Nature Area’ (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy. This strategy aims to connect and expand existing wildlife sites, creating a more integrated and resilient ecological network. Exmo_20 plays a crucial role in linking habitats, providing wildlife corridors between the Pebblebed Heaths to the north and the woodlands to the south.

The development of Exmo_20 would disrupt these connections, causing adverse effects on both the local biodiversity and the broader goals of the Nature Recovery Network.

The site is also home to species such as the Nightjar, which is a qualifying feature of the East Devon Heaths SPA. Studies show that Nightjars can travel up to 7km from their nesting sites to feed at night, making the loss of foraging habitats or the disruption of their flight paths a serious concern. Such disturbances could undermine the conservation objectives of the SPA and negatively impact the Nightjar population.

In summary, the allocation of Exmo_20 threatens irreplaceable habitats, disrupts vital wildlife corridors, and undermines the broader ecological objectives of the Local Plan and the Nature Recovery Network. The development of this site would lead to irreversible ecological damage, significantly affecting both the local and regional biodiversity.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in direct conflict with paragraph 13.9 of the Local Plan. According to the National Planning Policy Framework, ‘irreplaceable habitats’ are defined as habitats that are extremely difficult, or take an extended period of time, to restore, recreate, or replace once destroyed. The development of Exmo_20 would result in the loss of such irreplaceable habitats. The site contains a significant number of mature trees, many of which display signs of veteranisation. These trees are crucial for providing unique microhabitats that support a wide range of species. Their loss cannot be compensated simply by planting new trees, as these mature trees have established complex ecological roles that take decades, if not centuries, to replicate.

In addition to the trees, Exmo_20 is home to numerous long-established hedgerows that traverse the site, some of which stretch over considerable lengths. These hedgerows, along with the mature trees, contribute to a highly biodiverse environment, offering essential habitats and functioning as wildlife corridors. While it may be possible to leave spaces around some of these features, the overall degradation and fragmentation of the habitats they provide is unavoidable with the proposed development. The impact on biodiversity would be significant, and these natural features cannot be easily replaced or restored.

Furthermore, the site lies within an identified ‘Strategic Nature Area’ (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy. This strategy aims to connect and expand existing wildlife sites, creating a more integrated and resilient ecological network. Exmo_20 plays a crucial role in linking habitats, providing wildlife corridors between the Pebblebed Heaths to the north and the woodlands to the south.

The development of Exmo_20 would disrupt these connections, causing adverse effects on both the local biodiversity and the broader goals of the Nature Recovery Network.

The site is also home to species such as the Nightjar, which is a qualifying feature of the East Devon Heaths SPA. Studies show that Nightjars can travel up to 7km from their nesting sites to feed at night, making the loss of foraging habitats or the disruption of their flight paths a serious concern. Such disturbances could undermine the conservation objectives of the SPA and negatively impact the Nightjar population.

In summary, the allocation of Exmo_20 threatens irreplaceable habitats, disrupts vital wildlife corridors, and undermines the broader ecological objectives of the Local Plan and the Nature Recovery Network. The development of this site would lead to irreversible ecological damage, significantly affecting both the local and regional biodiversity.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in direct conflict with paragraph 13.23 of the Local Plan. The site lies within an identified 'Strategic Nature Area' (SNA 368), which forms an integral part of the Nature Recovery Network. This network, outlined in the Local Nature Recovery Strategy, aims to link and expand existing wildlife sites while enhancing habitats and biodiversity across the region. Exmo_20, as part of this strategy, serves as a vital connector between different ecological zones, facilitating wildlife corridors that enable species to move and thrive. The site connects the Pebblebed Heaths to the north with the woodlands to the south and beyond, forming a continuous habitat that supports a diverse range of species. The development of Exmo_20 would fragment these critical habitats, disrupting the connectivity that is essential for maintaining biodiversity and the health of local ecosystems.

This disruption is particularly concerning given that the area supports species that rely on the integrity of the landscape for their survival. Notably, the Nightjar, a qualifying feature of the East Devon Heaths SPA, relies on the heathlands for breeding and foraging. Research indicates that Nightjars can travel up to 7km from their nesting sites to forage for food, typically at night. The proposed development could lead to the loss of foraging habitat or disrupt the Nightjars' routes to their feeding areas, undermining the species' ability to meet its nutritional needs and jeopardizing the conservation objectives of the SPA. As these birds are already vulnerable to habitat fragmentation, the loss or disturbance of key foraging areas could have a devastating effect on their population and on the broader ecological balance of the region.

Therefore, the allocation of Exmo_20 would have far-reaching consequences not only for the immediate wildlife corridors and habitats but also for the long-term conservation

goals set forth in the Local Plan and the Nature Recovery Network. The development threatens to undermine the effort to combine and extend wildlife sites, with the potential to disrupt the delicate balance of local ecosystems, particularly those that rely on the integrity of the strategic nature areas and their associated habitats.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in clear and direct conflict with policy OL09 of the Local Plan. The recent Habitats Regulations Assessment (dated 30.01.25) raises significant concerns, specifically highlighting that there is, at present, a "lack of sufficient certainty to rule out adverse effects on the integrity of the East Devon Pebblebed Heaths SAC/SPA, particularly in relation to air quality." This uncertainty is particularly troubling as it underscores the potential, albeit unquantified, risks that the proposed development may pose to this important and sensitive ecological area.

One of the key issues identified in the assessment stems from the fact that the primary access route to Exmo_20 would be via the B3179, which passes directly along the boundary of the East Devon Pebblebed Heaths. This access route, therefore, has the potential to increase traffic volumes along the boundary of the SAC/SPA, a factor that could exacerbate air quality concerns, particularly in relation to nitrogen dioxide and other pollutants that are harmful to the delicate ecosystems of the heathlands. The additional traffic generated by the development could lead to a significant and lasting impact on the health of the protected site, especially given that the Pebblebed Heaths SAC/SPA is already vulnerable to the effects of atmospheric pollution.

Given this considerable uncertainty regarding the impact of air quality on the integrity of the site, it is evident that the allocation of Exmo_20, without further detailed and robust mitigation measures, could result in harm to the ecological value of the Pebblebed Heaths. This situation calls into question whether sufficient precautions are being taken to protect the health and sustainability of this vital natural resource. Furthermore, it highlights the need for the local planning authority to reconsider alternative sites that would not pose such significant risks to the integrity of the SAC/SPA, thus adhering to

the principles of the Habitats Regulations and the objectives set forth in policy OL09, which seeks to protect and preserve the natural environment from development pressures that could lead to adverse effects.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in direct conflict with policy PB01 of the Local Plan and fails to align with the established mitigation strategy. The proposed development at this location poses a significant risk to the integrity of the nearby Pebblebed Heaths (SAC/SPA), an area of considerable ecological value. Given the environmental sensitivity of the Pebblebed Heaths, the development of Exmo_20 would likely result in harmful consequences, including potential disruption to local wildlife habitats, biodiversity, and the overall ecological balance of the site.

Furthermore, there are alternative sites available for development that would have far less, if any, adverse impact on the Pebblebed Heaths. These alternatives would allow for necessary growth and development without encroaching on this environmentally sensitive area. By choosing Exmo_20 for development, the plan disregards the possibility of using less damaging locations, thus failing to adhere to the principles of sustainable development outlined in policy PB01. The proposed site not only contradicts the mitigation strategy but also undermines efforts to protect the ecological integrity of the Pebblebed Heaths, raising serious concerns about the long-term environmental consequences of this allocation.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in clear conflict with policy HE02. The scale of development proposed for Exmo_20, located in proximity to St. John in the Wilderness Church (Grade II* listed), would have profound and lasting negative effects on the serene and isolated environment surrounding both the church and its churchyard. St. John in the Wilderness Church, a historically and architecturally significant structure, currently benefits from a quiet, tranquil setting that provides an essential atmosphere for contemplation, reflection, and worship. The church and its immediate surroundings are integral to the religious and cultural experience of its congregation, with the peaceful environment contributing to the spiritual and communal values associated with the church.

However, the substantial development of Exmo_20 in such close proximity to this sensitive site would dramatically alter the existing setting. The introduction of new buildings, roads, and infrastructure would introduce a level of noise, activity, and visual intrusion that would undermine the calm and reflective atmosphere the church currently enjoys. The proximity of such a large-scale development would effectively strip away the seclusion of the site, transforming the space from one of peacefulness and historical reverence into one overshadowed by the demands of modern urban growth. This disruption to the church's surroundings would significantly impact not only the aesthetic and spiritual experience for those attending the church but also the broader historical context in which this important building is situated. The development threatens to irreparably harm the heritage value of the church and its grounds, undermining the objectives of policy HE02, which aims to preserve and protect such sensitive sites from developments that could alter their character and historical significance.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy OL05. The site's main access point is just 2.2 miles from Budleigh Salterton's centre but 4 miles from Exmouth, making Budleigh significantly more accessible. The natural route from the site leads directly into Budleigh Salterton High Street, whereas reaching Exmouth requires traveling twice the distance and skirting around its outskirts. Residents of Exmo_20 would naturally rely on Budleigh's High Street, doctor's surgery, primary school, and other amenities. Currently, Exmouth and Budleigh function as separate communities, but this development would blur that distinction, effectively merging the two by placing housing in one town while depending on services in the other.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 3.30. The settlement boundary of Exmouth has been extended to include not only the land designated for housing but also the 400m buffer zone adjoining the Pebblebed Heaths, effectively classifying it as suitable for development. While housing cannot be built on the buffer zone, its inclusion within the settlement boundary allows for other forms of development. This contradicts the precautionary approach, as the plan fails to provide robust protection against the adverse effects of recreational use on the Pebblebed Heaths.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy AR01(B). Located upstream of Exmouth in the main rainwater catchment area of Withycombe Brook, the site has heavy clay subsoil, making soakaways ineffective and causing frequent waterlogging. Development on this steep land would significantly worsen flood risks in the lower areas below the site and through Withycombe.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan-making process does not comply with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" during the HELAA Stage 2 assessment and was never a preferred or second-choice site, leading to its omission from Regulation 18 consultations. On 03/09/24, it was abruptly allocated despite the assessment being incomplete, with no opportunity for public or Strategic Planning Committee input.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan-making process does not comply with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" during the HELAA Stage 2 site assessment and was never a preferred or second-choice site, leading to its omission from Regulation 18 consultations. On 3rd Sep 2024, the site was suddenly allocated without a completed assessment, denying further public or Strategic Planning Committee input.

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan does not comply with PCPA 2004 Section 33A. Exmo_20 was deemed unsuitable and unachievable during the HELAA Stage 2 site assessment. It was never a preferred or second-choice site and was therefore omitted from Regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mark Nicholls

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of EXMO_20 is in conflict with policies SP01

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I cant see how given the distance

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

The allocation of Exmo_20 conflicts with policy SP01. Although Exmouth is a Tier 1 town, Exmo_20 is four miles from the town centre and detached from it, making it unsuitable for development as part of Exmouth.

Exmouth is already constrained by its location on a peninsula between the River Exe and the coast. With the town centre at the southern end, expansion is limited, and further development would be closer to neighbouring towns than to Exmouth itself.

Given its distance from the town, Exmo_20 is an unsustainable location for development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I don't see how it can be

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mr Roy Norton

Full name: Mr Roy Norton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO_20 would increase the need for car travel and increase traffic congestion, in conflict with paragraph 11.2. It is unsustainable development. It is isolated and people need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6. It is too far (and too steep) from any town centre for people to use walking and cycling as their choice of transport. This is contrary to policy TR01. The main access point of EXMO_20 is significantly closer to Budleigh (High Street, Doctors, school, beaches etc.) would be the obvious choice for residents of EXMO_20. This would lead to coalescence of Budleigh and Exmouth, contrary to Policy OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Paul Nother

Full name: Paul Nother

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 policies 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 Policies 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)

Full name: Paul Nother

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 policies 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 Policies 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)

Full name: Paul Nother

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

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Proposal:

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Sally Nowell

Full name: Sally Nowell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Regarding planning for houses and industrial estate for Feniton I am totally against it. The roads in and out of Feniton cannot take any more traffic as it is there are accidents waiting to happen. The thought of an extra 200 cars on these narrow lanes is terrifying. Delivery vans and lorries are also larger these days and with few pavements its dangerous for pedestrians and children being walked to school. Extra housing will not help the flooding problems and I understand that school and doctors surgery are full to capacity. Looking at the 2007 photograph of the triangular green in old Feniton you can see how the vehicles have ruined it by cutting corners.

Sarah Nutt

Full name: Sarah Nutt

Proposal:

5. Development in the Towns and Villages

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4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into account

D Nutt

Full name: D Nutt

Proposal:

5. Development in the Towns and Villages

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6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To make sure that our objections are heard and taken into serious consideration

Carrie Nutt

Full name: Carrie Nutt

Proposal:

5. Development in the Towns and Villages

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4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that our views are heard and taken into serious consideration.

Lesley Oats

Full name: Lesley Oats

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: However, it's unclear to me if the plan has been developed legally due to the following:

While I commend East Devon District Council (EDDC) for encouraging the public to 'Have Your Say', they insist the public use the Common Place system. It is complex, time consuming and deters the common man/woman from commenting.

Although a professional, I have spent many days trying to formulate my responses and, have also spent time trying to help others struggling. (I am fortunate that I have that time).

In previous consultations, emails, comments and a petition signed by over 500 Fenitonians were not reported, and therefore not considered by the Strategic Planning Committee as they were not submitted via the Common Place system. Effectively, the views of Feniton were ignored.

Common Place does not account for those that have no access to the internet or printer and therefore the on line form or paper version. This contravenes EDDC's own Equality Policy.

I believe the Common Place system is undemocratic, unfair and discriminatory. It also contravenes British Values and The Equality Act 2010.

Finally, although in a private, un-minuted meeting, I'm led to believe that Feniton Parish Council was refused to make representation on Otry_20, even though it was brought late to the table. The reason given that it is in the Parish of Ottery St Mary (OSM), although will have little bearing on OSM but has the ability to have a huge impact on the lives of Feniton residents.

References: EDDC's Equality and Objectives Policy 2021 - 2025 Fundamental British Values Equality Act 2010

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Make it easier for Jo Public to comment.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Flooding:

Firstly I would like to comment that previous developers have promised the earth to help with the issues Feniton faces but have not delivered and often not appear to have been held to account.

It is well documented that Feniton regularly floods, not only with storm water but also sewage.

Perhaps because the draft local plan appears to have been developed rather swiftly, EDDC doesn't appear to have considered the historic flooding events in the village. What concerns many residents is that more development will mean increased flooding. At the recent planning meeting for Feni_06 which was approved, it was in my opinion, an

insult to intelligence that installations of two water butts per household would help resolve flooding to any significant degree.

Kier, the company currently installing The Flood Alleviation Scheme (FAS) in Feniton has promised us that it will not cure flooding but only divert flooding away from homes and around the eastern side of the village. It is already known that it has been designed only to accommodate the current level of development in Feniton. We have been warned it will certainly increase flooding at Pattersons Cross, the main access route to and from the A30, which already gets cut off in times of heavy rain.

Despite the millions of public money having been spent on the FAS, we must remember that it is currently untested and there is no evidence of its efficiency!!

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding. It has also been witnessed that raw sewage, (and other unsavoury associated contents, used condoms, tampons etc), spews up via manhole covers flooding Ottery Road. South West Water often discharges raw sewage into a local ditch. Not appreciating the risks, children have been witnessed playing in the foul water. Homes and gardens have also been flooded with sewage, neighbours told not to use their toilets and to 'stuff a duvet down the loo to stop it overflowing. While my home has not flooded to date, during heavy rain I have heard the dreaded 'glug, glug' from my toilet which induces anxiety..... and the stench is vomit inducing!! My bathroom often smells offensive.

Sewage spillage poses a massive health risk, especially to the vulnerable of our society as is well documented in Dr William Weirs report, Consultant Physician for Infectious Diseases, of which EDDC have been made aware and have been sent.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy AR01 – C

Lack of Sustainability:

In 2014, at the expense of EDDC there was a Super Inquiry into the sustainability of Feniton. The Planning Inspector and EDDC agreed that Feniton was NOT a sustainable location for further development.

Apart from the FAS, there have been no other improvements in the infrastructure of the village to support the development suggested on the emerging local plan.

Vehicular access to the village is via mainly a network of lanes with pinch points, unlit, in places single track with minimal pavements. Many flood and become impassable, including Pattersons Cross, Station Road (including at the level crossing) and Colestocks Road leading to the A373, and subsequently the M5. They are all unsuitable for heavy traffic. The additional flooding and traffic, especially larger commercial vehicles will have a knock on effect for the surrounding lanes and villages.

Being unable to get in or out of the village causes residents much anxiety already and often limits our planned activities.

With the installation of the FAS, we have recently had insight into how increased heavy traffic will affect the village, especially when the Ottery Road/Green Lane junction was closed, causing traffic to use Feniton Old Village for access to and fro the village, subsequently causing extensive delays and significantly reducing road safety. This will become common place when Pattersons Cross floods more frequently due to the FAS.

For a quick walk, I would often take my dog up Green Lane but now choose to get in the car to go elsewhere, as you risk taking your life in your hands.

Increased housing will bring more families and children. However, Feniton Primary School is already at capacity which will lead to children having to be educated outside of the village, increasing the reliance on cars as a means of transport. This contradicts EDDC's vision of 'net zero carbon world'.

The school is also in great need of improvements and a significant upgrade.

Although, Feniton boasts a railway station, trains are limited in part due to the single track. Bus links are even more restricted.

Local GP services are currently struggling to serve the current population.

I note in the draft plan, the only infrastructure mentioned for Feniton is 1060m of new water mains to be laid by 2035.

In formulating this draft plan, EDDC appears to have disregarded evidence and planning history that Feniton is not a suitable location for the amount of development proposed.

The proposals for Feniton are not consistent with the local plan's stated vision and strategy; by extension with national policy.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 2 – 2.2 Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

Recently a survey completed by Devon Communities Together (DCT), identified a local need for only 13 homes up to the year 2027. This survey was funded by EDDC. This means that the allocated housing in the draft plan for Feniton is disproportionate to the DCT survey.

When this was noted by a Strategic Planning Committee member, the Chairman instructed that Strategic Policy SP01 in the Regulation 19 version be reworded to reflect the number of houses in the draft plan, ignoring the DCT survey. This has caused a mismatch between vision and strategy.

SP01 now states ‘limited’ houses. However, proposed development for Feniton is far from limited; it’s huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

Site Otry_20 is an unsafe location, totally unsuitable and will severely impact on road safety, especially for vulnerable road users.

This site is located off Green Lane which as most other lanes in Feniton is mostly single track, unlit, and with minimal pavements. Also, the entrance to the proposed site is between two over the railway line bridges, one single track with a blind bend. There are also blind bends at each end of the lane and it is so narrow in places, just wide enough for a car. Part is an ancient sunken lane where it can get blocked due to rock falls.

Please view the YouTube video which details the main issues -
<https://www.youtube.com/watch?v=6q7DQ6mpgh4>

Feni_08 is accessed via Broad Lane which has similar issues to Green Lane.

As Otry_20 was brought for consideration after the Regulation 18 consultation, it could be argued that EDDC hasn't had sufficient time to consider all the evidence regarding this site. The size of the site doesn't align with the Spatial Strategy and is disproportionate for a tier 4 village. Also, it would appear to have a disproportionately large allocation of industrial, warehousing and distribution than other employment sites in Tier 1, 2 and 3 locations.

Having been brought up in a small village, I moved to Feniton in 2017 from a large industrial town, wanting a quieter way of life and enjoy a rural village setting. Since moving to Feniton, I have seen the village constantly fighting development in order to reduce and minimize the problems it faces and to retain its community feel, character and charm. I consider the scale of development proposed for Feniton, especially Otry_20 will thoroughly undermine the village.

References: Chapter 2 The Vision – 2.6, 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Until infrastructure in Feniton is drastically improved, I believe the emerging local plan should reflect the Super Inquiry of 2014 and the DCT survey.

I do appreciate there is a need for sustainable and affordable homes and therefore to ensure a sustainable plan, better reflect the tier 4 status of Feniton and realign the Strategy and Vision, my suggestions would be:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08, bearing in mind Feni_06 has already been approved.
- Removal of Otry_20 from the draft local plan.
- No further building until the effects of the FAS are known.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Catherine OConnor

Full name: Catherine OConnor

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

First: development will not be permitted if it could lead to or encourage settlement coalescence. The allocation of Exmo_20 will lead to coalescence between Budleigh and Exmouth. Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. (POLICY OL05: This policy stated that development will not be permitted if it could lead to or encourage settlement coalescence).

Second: Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Catherine OConnor

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Further reasons in addition to Unsustainable Location include Flood Risk and the impact on the Grade II* listed church St John in the Wilderness.

First: Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. (POLICY AR01(B) states that development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere).

Second: ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. (POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Catherine OConnor

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This is for two reasons.

First: “Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;”

Second: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Modification necessary is as follows: Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Unsustainable Location

Allocation of EXMO_20 is in conflict with policies SP01, TR01, TR03, and paragraphs 11.2, 11.6, 3.34 and 2.6 of the Local Plan. ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location. (POLICY SP01 proposes to promote the most significant levels of development at the principal centre of Exmouth).

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements. (PARAGRAPH 11.6 proposes that it is feasible for

larger developments to be within 800m of key services and facilities. (Studies cited in the Local Plan show that people prefer to walk if their journey is not further than 800m/10 minutes walking each way)).

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion. (POLICY TR01 proposes that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development).

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of

0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. (Paragraph 11.2 promotes focussing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion).

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards

infrastructure etc it will not add another Doctors' surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewage has been featured on national news several times, highlighting the scale of the problem it has. (PARAGRAPH 3.34 states that by directing growth to the tier 1-4 settlements their approach ensures development is concentrated in areas with existing infrastructure and services).

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard. (POLICY TR03 states that where development is likely to generate significant amounts of vehicle movements planning permission will not be granted unless they can identify measures to secure new sustainable travel arrangements, taking into account (amongst other things) the scale of development and the availability of public transport, and walking and cycling opportunities).

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon. (PARAGRAPH 2.6 states that "Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There has been a failure to comply with the duty to co-operate in relation to Exmo_20. The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jason Odell

Full name: Jason Odell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Whim_08a is unsound due to conflict with policies, infrastructure concerns and lack of evidence I object to the inclusion of site Whim_08a in the EDDC Emerging Local Plan on the grounds of soundness. This proposed allocation is not justified, not supported by proportionate evidence, and is inconsistent with several key Local Plan policies. The site lies within the designated Green Wedge between Whimble and Cranbrook. According to Policy OL05, development in these areas should be avoided where it risks settlement coalescence or harms the character of the local landscape. Allocating Whim_08a would undermine Whimble's rural identity and clearly breaches this policy. Access to the village from the site is also unsafe. There are no pavements along Church Road – the main route to local amenities such as the school and shop – and the road is narrow and hazardous. The police and Community Speed Watch group have both raised concerns. This directly contradicts Policy TR01, which aims to prioritise walking and sustainable transport. The allocation also fails to align with local housing needs. The Whimble Housing Needs Survey identified a requirement for only four affordable homes over five years, yet this plan allocates 83 homes in total (Whim_11 and Whim_08a), far exceeding what is required. This conflicts with Policy HN01, which states that housing development should reflect identified need. There are also unconfirmed wildlife habitats on the site that have not been properly assessed, and no updated flood risk or environmental assessments have been provided to support this partial allocation – despite it having previously been ruled out by EDDC's own planning officers. Furthermore, the allocation of Whim_08a appears to have been made spur-of-the-moment, going against professional advice and without clear justification. Meanwhile, other more suitable sites — including land to the east of Church Road near established infrastructure — have not been properly evaluated. The Parish Council has asked that these alternatives be considered before any final allocations are made. Importantly, the

plan also ignores the 1,500 homes already approved in the Cobdens Expansion of Cranbrook, which falls within Whimble Parish and includes a school and traveller site. These homes will meet housing needs with far better access to infrastructure than Whim_08a. Ignoring them when determining Whimble's housing allocation further undermines the soundness of the plan. In summary, this allocation is unsound. It conflicts with planning policy, disregards expert assessments, fails to reflect local needs, and does not follow a transparent or evidence-led approach. I request that Whim_08a be removed from the Local Plan.

Julia Ojaim

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to express my strong objection to the application to build 700 houses under plan Exmo_20 – 20a and 20b. I fully understand the need for additional housing and for the governments drive to reach targets however I feel this site would be detrimental to the environment and to the town. Access Firstly, I would like to address the access through Southern Wood. The road was not designed as and is not suitable as a through road for up to 1000 cars. The existing infrastructure of the surrounding roads is not capable of accommodating this increased demand. The comment by the developer in the vision document for “St Johns Woodland Village” implies walking and cycling would be prioritised, I think we all know this is untrue. Access for buses, which would have an increased demand, would also be very difficult. A bus service through Meadow View was cancelled a few years ago for this very reason proving this is not a sustainable option. From a safety concern Emergency Vehicles such as Fire Engines and Ambulances would without doubt have access issues. I also feel there would be a safety issue for pedestrians who would have to dismount pavements and cyclist who would have to mount roads in order to avoid cars which have been forced to park in dangerous positions. I have not seen the plans for the bridge at the bottom of the road yet and so do not know the infrastructure behind it. Where will it start? What barriers will there be? Agreed I am not an engineer, but I assume the bridge will need to be very substantial in order to carry the vehicles and materials required for the construction in the first instance then long term. Once the bridge is in place the precious parking spaces at the bottom of the road will be removed forcing more cars to park on the road. Adding to the parking issues we already have which in turn will limit the size of vehicles able to get through. When access off the Salterton Road or through the readymade Liverton Business Park is easier, more practical, and most importantly safer, I fail to see why this is not the obvious and preferred option. Impact on the environment Secondly

there would be a very negative impact on the environment. A variety of wildlife, including protected species, live in the assigned development area such as not limited to woodpeckers, bats, fox, deer, Dormice and Buzzards to name but a few. This proposal would be a destruction of their habitats. A negative effect on the local ecosystems and ecology, reduced air quality, light pollution, increased traffic, increased flood risks, and a decline in local biodiversity are just a few of the environmental repercussions all having long term effects. In addition, there will be the potential pollution from construction activities. Turning natural drainage into a concrete jungle invites a huge flood risk and with the issues Southwest Water are currently facing I feel this will only enhance the issue. They cannot cope with the waste management system as it stands today! The bridge itself could also cause a build-up of debris causing flooding. Impact on local amenities and services Lastly but by no means least is the impact on local amenities The Goodmores Development off Dinan Way is not anywhere near finished so the impact that will have on the town, in the short and long term, is unknown. With all the additional people coming to live in Exmouth there will be excessive strain on an already bowing services. Access to Healthcare, whether that be a Dr, Dentist or Hospital appointment is difficult if not impossible to get. We do not have enough Police to cover the current requirements of the town without extending the size quite dramatically. Maintaining access to essential amenities and services is crucial for the well-being and quality of life of residents. Who are buying all these houses, families with children? Therefore, schools will also be affected. If I am correct the original plans for the Goodmores development included a school, these plans were passed and I assume changed after, as there doesn't appear to be a school!!! I feel very strongly opposed to the development of Exmo_20 and would very much appreciate if my voice could be heard. Thank you for your time in reading this letter.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20, Under paragraph 5.3, page 78 of plan, states that “vehicular access, to accommodate modest levels of development, will be allowed for southern site parts from the road ‘Southern Wood’.” No information is given as to what exactly forms the ‘southern site parts’, how many houses this comprises, nor the measures that will prevent the entire site using an access point via Southern Wood. It should therefore be assumed that any entrance to the site via Southern Wood would be available to the entire site of 700 homes.

The Government Centre for Social Research published a study in June 2024 on Car Ownership that stated amongst its key findings under 1.1.1. that “the proportion of households with one car has remained at around 45% and the proportion with two or more vehicles has increased from 8% to 34%.” So it is safe to assume that with 700 homes there will be around 1000 vehicles on the proposed site of Exmo_20. It is also worth noting that the average cars per household in Southern Wood currently is more than 2 cars per household which supports the likely quantity of cars in Exmo_20. While Southern Wood is a quiet cul de sac, the road connecting it to the nearest main route is Meadow View Road which is constantly full of parked cars and at numerous points it only passable for one vehicle at a time. Vehicles have to regularly stop and give way, sometimes reversing to create space, and cars will regularly be stuck on Dinan Way, unable to even turn in to Meadow View Road.

It’s also worth noting that Meadow View Road on which had regular scheduled bus services cancelled due to lack of accessibility. It is ludicrous to think that 1000 vehicles taking an average of 2 trips per day, would not make the situation considerably worse than it already is. Any properly conducted assessment that took place around school

pick up times and rush hours would see how unfeasible Southern Wood is as an access point.

Furthermore, any access via Southern Wood would necessitate a bridge being built over Withycombe brook at the end of Southern Wood. We have not seen the plans for a potential bridge at the bottom of the road yet and so do not know the infrastructure behind it but given the positioning of the brook it would need to be substantial and inevitably seriously negatively impact Southern Wood and its residents as well and the woodland habitat surrounding the bridge.

Once the bridge is in place the precious parking spaces at the bottom of Southern Wood will be removed forcing more cars to park on the road, adding to the parking and road accessibility issues already faced by existing residents.

When access through the ready built Liverton Business Park via B3179 is easier, more practical and most importantly safer, I fail to see why any other entrance is required, particularly given the impact.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not consider any access point to Exmo_20 via Southern Wood. Instead rely solely on the B3179 access via Liverton Business Park.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident whose family live near to the proposed site of Exmo_20. I therefore have a vested interest and would like to be present for any and all hearing related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of car travel through the development each time residents leave their home and returned.

In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. With a large development of around 700 homes and noting the UK average of 1.29 cars per household, the proposed development would lead to around 1000 additional cars hugely increasing congestion and pollution in the area which directly contradicts Paragraph 11.2.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20

from the Local Plan and instead look to develop a far more suitable location close to existing amenities and transport links.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident and my family, who live very near to the proposed site of Exmo_20, will be severely impacted if the planned development goes ahead. Therefore I would like to be present for any and all hearings.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

Paragraph 17 – HELAA assessment concluded that the proposed site for Exmo_20 was “Available but not suitable or achievable” [appendix E(v)1]. However the Sustainability Appraisal Report states that Exmo_20 was assessed as suitable, available and achievable in the HELAA” which is incorrect. A key process for the site selection has not been adhered to by EDDC and an incorrect outcome of a report recorded.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

Exmo_20 directly contradicts Chapter 17, paragraph 17.1 of the local plan which states that sites must be "Suitable for residential development according to Local Plan and NPPF policies."

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Find an alternative site(s) because Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 directly contradicts Chapter 17, paragraph 17.1 of the local plan which states that sites must be “Suitable for residential development according to Local Plan and NPPF policies.”

The plan making process has not been in accordance with National Planning Policy Framework Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Find an alternative site(s) because Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2).

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ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

This is taken from a quotation from the Gospel of St John: 'I am the voice of one calling in the wilderness, make straight the way of the Lord. ' – St John will now be calling god from a housing development of 700 homes instead of the current wilderness surrounding this Grade II* listed 14th century church.

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). Turning the natural drainage the site current provides through trees and grassland into a concrete jungle invites a huge flood risk, particularly to all of the existing houses and businesses bordering Withycombe Brook.

The proposed site of Exmo_20 sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. In addition there will be the potential pollution added to flood waters from construction activities.

A site entrance via Southern Wood has been included in the plan for Exmo_20 that would require a large bridge to be built over Withycombe Brook that runs along the end of Southern Wood (it would NOT be possible to access the site from Southern Wood without a bridge being built). Withycombe Brook regularly floods and there has been land erosion as a result of flooding to the area at the bottom of Southern Wood where the bridge would need to be built and surrounding homes. The bridge itself could also cause a build up of debris causing further flooding.

A nearby development, Goodmores, is still under construction and we are already seeing swathes of mud and flood water covering areas of the main access road that is Dinan Way. Water run off from Exmo_20 would inevitably compound this issue due to the location of the proposed site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location that does not increase flooding all along Withycombe Brook

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Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been deliberately extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths Nature Reserve, therefore changing the definition of this land to be acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

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Allocation of Exmo_20 is in conflict with policy OL05 as it would effectively join the town of Exmouth and Budleigh Salterton by removing the green belt currently separating the towns – very definition of coalescence being “the joining or merging of elements to form one mass or whole.”

The primary access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down in to it.

The High Street, Doctor’s surgery, primary school, beach etc in Budleigh Salterton would be the most accessible, nearest and therefore the obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two towns, with residents living in one town whilst relying on the already over stretched day-to-day services and infrastructure of the other.

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relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location where two town will not be forced to coalesce.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead.

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

This is taken from a quotation from the Gospel of St John: 'I am the voice of one calling in the wilderness, make straight the way of the Lord. ' – St John will now be calling God from a housing development of 700 homes instead of the current wilderness surrounding this Grade II* listed 14th century church.

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3(b). If no, please give details 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 proposed site of Exmo_20 is distinctive for its dark skies, tranquillity and wildness. In addition to light that will inevitable be produced from the housing and lamp posts on the development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site.

The area around the neighbouring St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development surrounding it, regardless of a buffer zone being left. This will also have a negative impact on church goers and those with loved ones in the surrounding cemetery.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location.

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ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines ‘irreplaceable habitat’ as “habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed”. Exmo_20 will cause loss of long established and irreplaceable habitats.

The woodland on the site has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees that would take hundreds of years to mature and are unlikely to ever achieve the same level of biodiversity.

We have already seen healthy veteran trees being felled on the proposed site of Exmo_20 to produce pathways from what was previously dense and undisturbed woodland. These newly created pathways have been since described as ‘naturally occurring’ which is absolutely incorrect.

The Exmo_20 site also contains many long established hedgerows, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable.

Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these birds fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or

disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths Nature Reserve at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

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ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths National Nature Reserve at the north of the site through to the woodland at the south and beyond, all of which would be very negatively impacted by the development of Exmo_20.

Just one of many examples are Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies have shown that these birds fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

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ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. The development would absolutely NOT support any increase in biodiversity, instead hugely reducing it. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

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Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01.2025) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location that will not affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 (including SAC/SPA).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The proposed site of Exmo_20 is along the boundary of Pebblebed Heaths Nature Reserve. The Pebblebed Heaths Conservation Trust was established by Clinton Devon Estates in 2006. Its creation was in response to increasing national and European recognition that lowland heathlands are a habitat rich in wildlife, are highly threatened, and require professional management to maximise their wildlife value.

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath.

The entire proposed site of Exmo_20 is currently home to a large variety of wildlife (some of which are protected species) including woodpeckers, bats, fox, deer, dormice and buzzards to name but a few. This proposal would lead to a destruction of their natural habitats and have unknown but certainly negative impact on the neighbouring nature reserve and on the local ecosystems and ecology, reduce air quality, increase light pollution, increase flood risks, and see a significant decline in local biodiversity. In addition there will be the potential pollution from construction activities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or even no harm to the Pebblebed Heaths Nature Reserve (SAC/SPA).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ·Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, what is now green fields and historic woodland with an abundance of wildlife will be replaced with 700 houses and roads, a 'comprehensive development scheme' within a rural part of East Devon.

The rural, natural site is currently home to a large variety of wildlife (some of which are protected species) including woodpeckers, bats, fox, deer, dormice and buzzards to name but a few. This proposal would lead to a destruction of their natural habitats.

The development of Exmo_20 would have a very negative effect on the local ecosystems and ecology, reduce air quality, increase light pollution, increase flood risks, and see a significant decline in local biodiversity. In addition there will be the potential pollution from construction activities.

Turning natural drainage into a concrete jungle, particularly with huge numbers of trees being removed, invites a severe flood risk and with the issues South West Water are currently facing with sewerage this will only enhance the issue.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: · Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. With all the additional people coming to live in Exmouth there will be excessive strain on an already bowing services.

Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. GPs in Exmouth are already facing wait times of 3+ weeks to acquire an appointment. Similarly does not have enough Police resource to cover the current requirements of the town without extending the size dramatically.

The proposed development on Exmo_20 does not include provision for another primary or secondary school - within the last 3 years numerous Exmouth children have had to travel 30-40 mins to attend school in Cranbrook due to there being no capacity at Exmouth Community College. The original plans for the nearby Goodmores development included a primary school which has yet to even begin development, further increasing strain on local schools.

The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has. Other developments have added significantly to the sewerage problem in recent years. The Goodmores Development (off

Dinan Way in Exmouth) is not anywhere near finished so the impact that will have on the town, in the short and long term, is unknown. However, increased flooding and sewerage issues have increased since the build went ahead.

Maintaining access to essential amenities and services is crucial for the well-being and quality of life of existing residents.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: · Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan.

The proposed location on Exmo_20 and it's distance from amenities means that there are no viable options to create sustainable travel alternatives to using cars. Research findings around the distances from the site to local services show that using cars will be by far the preferred choice of transportation for residents which directly contradicts Policy TR03.

Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no direct access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. With a large development of around 700 homes and noting the UK average of 1.29 cars per household, the proposed development would lead to around 1000 additional cars hugely increasing congestion and pollution in the area which directly contradicts Paragraph 11.2.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and instead look to develop a far more suitable location close to existing amenities and transport links.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far.

It will also be a difficult location for those without car access and cause social exclusion.

It is also worth noting that the existing infrastructure of the surrounding roads is not capable of accommodating the increased demand that Exmo_20 would cause. Access for buses, which would have an increased demand, would also be very difficult. A bus service through Meadow View Road (next to the proposed site) was cancelled a few years ago for this very reason proving this is not a sustainable option. From a safety concern Emergency Vehicles such as Fire Engines and Ambulances would without doubt have access issues.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. The minimum walk to the nearest shop is 20-25 minutes.

There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan in favour of more suitable locations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, the proposed development of Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. It is closer to neighbouring towns than the centre of Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth, directly conflicting with the policy SP01. Any development here will be a long distance from the town such that it is an unsustainable location.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan, instead look to develop much smaller sites closer to the principal centre of Exmouth OR other sites across East Devon.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a local resident living close to the proposed site of Exmo_20 and will be very negatively impacted if the development goes ahead. I would like to be present for any/all hearings related to this site.

Full name: Julia Ojaim

Proposal: 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.: On p.340 it states “Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects:

- Mitigate impact upon Exe Estuary and Pebblebed Heaths SPAs – to be considered in the Habitats Regulations Assessment, though for areas of Exmo_04 and 20 within 400 metres of the Pebblebed Heaths mitigation would not be seen as possible. Exmo_04 can be amended to exclude the most sensitive area, resulting in Exmo_04a.”

On page 342 Exmo_20 is listed as a preferred alternative for Exmouth, yet as it failed HELAA stage 2 being deemed “not suitable or achievable”, in accordance with the 2.4 of this Sustainability Appraisal report, it cannot be a preferred alternative. The document is inconsistent, not justified and therefore not sound.

On p.343 the reason for rejecting sites lists: Exmo_04b – Land at Marley Drive is rejected due to major adverse biodiversity effect arising from its location within 400 metre Pebblebed Heaths exclusion zone.

This is inconsistent with the Exmo_20 allocation and therefore not justified and not sound. The site allocation and the settlement boundary, at the very least, must be repositioned 400 metres from the Pebblebed Heaths Nature Reserve.

Full name: Julia Ojaim

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.: In the Exmouth Sites climate change adaption commentary (p.336), there is no mention Exmo_20 having flood risk at the lowest end of the site which runs along Withycombe Brook. Nor is it mentioned that this large currently greenfield and woodland area entirely drains into Withycombe Brook, which has significant identified flood risk in Exmouth and has not been assessed in the Strategic Flood Risk Assessment of this draft Local Plan [EDDC Level 1 Strategic Flood Risk Assessment – Final Report February 2024 p.69 states “This table does not provide information on all Main Rivers in East Devon. Other Main Rivers within East Devon are: Grindle Brook, Wotton Brook, Withycombe Brook, Budleigh Brook, Back Brook, Snod Brook, The Gissage and Woodhayne Range.”]. Considering the existing conditions, the position of the site in relation to the Brook that runs through the centre of the largest settlement in East Devon, and the substantial size of the proposed Exmo_20 allocation upstream, this is completely unjustified. In the sites access to services comments (p.338), a figure of 1,600 metres is used, this should be 800m as the 1600m is total trip ‘there and back’ [All links reference on p.186 of the Local Plan are broken/out of date but the Government’s National Design Guide does states 800m. “Sustran, Walkable neighbourhoods” also states 800m as standard walkable distance and 1600m total trip]. Distances should be measured from site centres, not nearest point. For a large site such as Exmo_20 where the entire site is over 800m long this should be a material consideration in this section. Using the 1,600 metre figure is unjustified. In the Exmouth Sites connectivity and transport commentary (p.340), it is stated that Exmo_20 is within 800m of the A376 which is categorically untrue and therefore not justified. It also should be noted that distances should be measured from site centres, not nearest point, as for the proposed site of Exmo_20 is over 800m long. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Full name: Julia Ojaim

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.: Figure 2.2 (p.11) states that “1. Biodiversity: to conserve and enhance the habitat and wildlife of our natural environment. Natural habitats and biodiversity; flora and fauna Ensure current, and potential future, habitat connectivity is not compromised”.

Allocation of Exmo_20, a supporting habitat for foraging Nightjars, would be inconsistent with this statement. In addition, Exmo_20 is located on the SNA 368 which is being allocated as a site with the Devon Local Nature Recovery Network (LNRS) as required by the Environment Act 2021, so going ahead with the development in the currently proposed location would be in conflict with this strategy of conserving and enhancing the habitat and wildlife of our natural environment. This is unjustified. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

On page 11/12 it states “4. Climate change and carbon emissions. Development that minimises the need to travel by providing access to public transport, cycle.” Allocation of Exmo_20 would not minimise the need to travel, as it is in an unsustainable location around 4km from amenities and therefore it is not in any way going to minimise need for travel by car. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20. On page 18, figure 2.4: Site criteria to be considered as a ‘reasonable alternative’ confirms that Exmo_20 cannot be a reasonable alternative as it failed the HELAA stage 2 being deemed “not suitable or achievable” (HELAA Appendix E(v)1). Its allocation is therefore not sound. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Full name: Julia Ojaim

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 should make reference to the Mitigation Hierarchy which prioritises avoidance over mitigation. This structured approach to managing environmental impacts is embedded 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 Not using the Sustainability Appraisal Framework in the site selection methodology or process for Exmo_20 is inconsistent with national policy and therefore not sound and arguably not legally compliant. Other sites showing as preferred options within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for use instead of Exmo_20.

Full name: Julia Ojaim

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.: Exmo_20 is on the list of reasonable alternatives on p.328, with the incorrect justification that all the sites were assessed as 'suitable, available and achievable' in the HELAA. Exmo_20 was in fact deemed not suitable or achievable. This provides evidence that Exmo_20 does not have potential to be delivered, the inclusion is unjustified and must be excluded from the Local Plan. Other sites, shown as preferred within the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Anna Oldroyd

Full name: Anna Oldroyd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Don't go for the easy and cheap option of building on green belt land. Find a previously used site, such as a derelict/demolished house, car park. Or even better, go down the much harder, less environmentally destructive route of wondering why we are building homes for a population with a decreasing birth rate and address the cause for an increasing population despite this. Once developments are in place, they are never reversed. I honestly cannot believe that housing would be even contemplated so close to our pebble bed heaths.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Timothy Osullivan

Full name: Timothy Osullivan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This area of land is considered to be the natural transition between the town and the common land , in destroying it means it will alter the common land in all respects. The landowners have already ruined the Maer Valley and this will only result in another great loss which will also result in complete over population of the area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It would be better to just extend Littleham instead .

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Louisa Owen

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: COMPLIANT'. Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lympstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lympstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of NPPF Chapter 3

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lypstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: HERITAGE / ST JOHN IN THE WILDERNESS CHURCH Submit this under chapter 5 - policy SD01. Select ‘No’ to being sound. Allocation of Exmo_20 is in conflict with policy HE02 which requires that proposals for development are sympathetic to listed buildings and their settings. A development the size of Exmo_20 and its suggested extension to the surrounds of St John in the Wilderness Church (grade II* listed) will have huge deleterious impacts on the remote, ‘wilderness’ setting of this important heritage site.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd

choice' site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lypstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: INCREASED FLOOD RISK Submit this under Chapter 5 - policy SD01. Select ‘No’ to being sound. Allocation of Exmo_20 is in conflict with policy AR01(B) as it will significantly increase and exacerbate flood risk to neighbouring areas. The significant levels of proposed development on a steep site that is upstream of Exmouth and drains into the Withycombe Brook is of serious concern to current residents who already note the added volumes and rates of flow on the brook, with implications for erosion, flooding and risk to life when managing (see attached photograph from winter 2024/25 – the stream is typically ankle deep). There is a lot of existing natural and physical infrastructure along this brook that cannot accommodate increased run-off from the adjacent areas (e.g., woodlands adjacent to and access roads over the stream). Increased flooding would damage mature trees next to the stream and cause water logging of gardens and 1 acre of mature wildflower meadow in our property. Furthermore, water flow over winter is already noticeable increasing in intensity and will

continue to do so with climate change all of which would be significantly exacerbated by such extensive proximate development

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lypstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
NATURAL ENVIRONMENT

Allocation of Exmo_20 is in conflict with PB01 and its proposed mitigation strategy. The Regardless of any proposed buffer the sites as a whole is still likely to have a direct and indirect adverse impact on the sensitive and unique Pebblebed Healths, which are nationally and internationally designated sites (SAC/SPA). Exmo_20a in particular was a recent addition to the Local Plan proposal (with the most direct impact), suggesting that alternative sites are available but were only excluded because councillors in other towns fixated on this site as a single, large-scale solution. Exmo_20 is in conflict with OL09 that states that permission will not be given for developments which result in pollution that cannot be adequately mitigated. The lack of connectivity between Exmo_20 and accessible and safe walking, cycling and public transport (train) will lead to additional use of vehicles and their concentration along B3179. The Habitats

Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. Developments at this site would not be able to sufficiently mitigate for this impact. Exmo_20 is in conflict with paragraph 2.10 of the Local Plan and objective 8 to “protect and enhance our outstanding natural environment and support an increase in biodiversity”. The site is teeming with wildlife (bats, birds, foxes, deer, badgers), insects, flowers and mature trees, as well as being adjacent to SAC/SPA/SSSI locations. The scale of the proposed development (700 + houses) would not allow these adverse environmental impacts (biodiversity and carbon emissions) to be mitigated onsite or through alternative sites for Biodiversity Net Gain and NetZero obligations. Exmo_20 is in conflict with paragraph 13.23 of the Local Plan, which recognises that East Devon has a fragmented landscape of natural habitat and need to maintain habitat connectivity for its biodiversity. The Exmo_20 area connects habitats and provides wildlife corridors between the Pebblebed Heaths and the southern woodlands. We often see wildlife traverse our property and the adjacent fields and woodlands. Our property adjacent to the proposed Exmo_20 has bat roosting, evidence of badger activity and frequent deer transiting up and down the stream. Previous ecological studies are available if required. Moreover, the site lies within the 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network part of the Local Nature Recovery Strategy, which would be entirely disrupted by development within Exmo_20. Finally, the designation of the East Devon Heaths SPA is based on qualifying features / species such as the Nightjar which has a range of 7Km from nesting to feeding grounds. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 is in conflict with paragraph 13.9 of the Local Plan which aims to protect irreplaceable habitats and important features. The proposed site contains the pebblebed heaths, significant numbers of mature trees, important waterways and long-standing hedgerows that would be “technically very difficult (or take significant time) to restore, re-create or replace once destroyed” (National Planning Policy Framework). Exmo_20 is in conflict with OL01 which prohibits development that would “harm the aesthetic and perceptual factors such as “tranquillity, wildness and dark skies”. The location of the site, its scale and the added vehicle traffic along B3179 would damage all of these important features of this rural location on the outskirts of Exmouth. Notably, the pebblebed heath (SPA/SAC/SSSI) and St John in the Wilderness church would be adversely impacted by the loss of dark skies, tranquillity and wilderness. Our property adjacent to the proposed Exmo_20 has approximately 1 acre of mature wildflower meadow, bat roosting, evidence of badger activity with deer transiting up and down the stream. Previous ecological studies are available if required.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lypstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: COALESCENCE BETWEEN BUDLEIGH AND EXMOUTH Submit this under Chapter 5 - Policy SD01. Select ‘No’ to being sound. Allocation of Exmo_20 is in conflict with policy OL05 as it encourages settlement coalescence. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The High Street, Doctor’s surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Louisa Owen

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations. Under pressure from councillors in other wards (Lypstone most notably), the site went from 'ongoing assessment' to 'allocated' on 3rd Sept 2024 and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. This is in direct contravention of PCPA 2004.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20 needs to be removed from allocation in the Local Plan as legal compliance cannot be re-gained retrospectively.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

UNSUSTAINABLE LOCATION

1. Allocation Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. New development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth.

2. Exmouth_20 is in conflict with Local Plan paragraph 11.6, which suggests new developments within 800m of key services and facilities should be feasible in larger settlements and developments. This is not the case for current housing surrounding the proposed Exmo_20 site and would not be the case for any new development in that area. The only facility within walking distance currently is Bassets Farm primary school (and Exmo_20 would be further away from this). No other facilities or services (shops, vets, doctors, dentists, garages) are within 800m so walking is not an option. Nor are the cycling routes safe enough to allow from this mode of transport from the area.

3. Exmo_20 is also in conflict with Local Plan paragraph 3.34 which assumes that Tier 1 settlements provide sufficient existing infrastructure and services. This is not the case in Exmouth which has well established limitations in critical services including the secondary school, sewage infrastructure and doctors and dentists. The proposed development would not address these key deficiencies in local infrastructure and services.

4. Exmo_20 is in conflict with policy TR01, TR03, Local Plan paragraph 11.2 and the National Planning Policy Framework which requires East Devon District Council to focus “significant development on sustainable locations that reduce travel needs and offer transport choices”. This planned location is more than 1 - 4 miles from critical central infrastructure (including local employment and the train station). Residents will be reliant on car travel (which will add a significant burden with over 700 houses proposed), with access routes into and out of the site requiring people to travel around the site before heading into Exmouth town centre. The site is not well connected to existing walking, cycling and public transport links that are already deficient for the surrounding areas and hampered by surrounding roads that are unsafe for cycling (Dinan, Salterton and Outer Ting Tong). Providing these within the site would not address issues of connectivity to the rest of Exmouth. Those without access to a car, particularly younger and older generations, will find living in this location challenging and exclusionary. In accordance with TR03, this would mean that even if Exmo_20 was included in the Local Plan, planning permission would not be granted because the development cannot feasibly mitigate for significant increases in vehicle movements particularly given the proposed scale of development.

5. Exmo_20 is in conflict with Local Plan paragraph 2.6 which states that only modest and sensitively planned development will be supported to ensure Rural East Devon retains its outstanding charm and character. This Exmo_20 is the among the most rural locations in Exmouth and this development is not modest or sensitive. The proposal put forward by the land-owners and developers for this site is false impression of a 700 house site, and is not in keeping with their track-record on development in Exmouth (e.g., Goodmores is not in keeping with a charming Rural East Devon).

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 has rightly been excluded from previous Local Plans for Exmouth and was deemed “not suitable or achievable” at site sifting stage for the current local plan (HELAA Stage 2). It was never considered a ‘preferred’ or ‘2nd choice’ site and was omitted from Regulation 18 consultations with Devon County Council. This is in direct contravention of PCPA 2004 Section 33A.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I do not trust the consultation and planning processes as they have evolved so far. I object to Exmo_20 inclusion on multiple grounds and believe that councillors who went against the advise of planning officers did so without due concern for policy consistency or legal requirements for legal compliance and duty to co-operate.

suzanne page

Full name: suzanne page

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.27

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.: The suggestion to use the land at Feniton is inappropriate due to road service to the site. It has been recently shown during the flood alleviation works with increased HGV traffic to this site and redirection during road closures the villages experienced road traffic delays of up to 30 minutes when two hubs attempt to pass on the road. Constant permanent increase in HGV traffic on the single lane roads that serve the site will result in ongoing widespread road obstructions impeding children's ability to access school on time and affecting the villagers ability to get to work.

Also residents of old Feniton use green lane to walk to the station HGVs on this road will be high risk for road traffic accidents with cyclists and pedestrians on the lane.

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.: If access to the site is via green lane not off the main road (A30) then the road would need to be dual lane with pavements and or cycle paths added to the station for safety.

Or access only off the a30

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)

Janet Palmer

Full name: Janet Palmer

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: n/a

Stephen Palmer

Full name: Stephen Palmer

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I fundamentally oppose the continual addition of substantial expensive housing developments on green field sites on the edge of Exmouth. There are many empty buildings in the centre town that could be redeveloped to provide the affordable housing required by local people. It is also clear that the amenities within Exmouth are at breaking point, especially sewerage and significant additional housing will only exasperate the current shameful situation. There are large businesses in locations like Withycombe and Pound Lane that should be relocated and replaced with affordable housing so that large, dangerous vehicles used by and delivering to these businesses are not sharing narrow roads with children walking to and from school, etc. if additional housing on the edge of Exmouth is unavoidable, care must be taken to retain green space within the town, not cramming in new houses into every corner possible, and developing additional parks, and safe cycle ways and walk ways.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Simon Pardoe

Full name: Simon Pardoe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Exmo_17 is on National Landscape land - this would set a terrible precedent

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_17 from plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Ivan Parker

Full name: Ivan Parker

Other party name (if relevant): Richard Parker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be located elsewhere where it would cause less or no harm to the Pebblebed Heaths.(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and at variance with the mitigation strategy. Exmo_20 would destroy the "tranquility, wildness and dark skies" of the countryside which is contrary to POLICY OL01 Developing Exmo_20 would destroy wildlife corridors and fragment and isolate habitats contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, mature and ancient trees and species rich hedgerows throughout the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to ... air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 conflicts with POLICY OL09 and POLICY PB04.

St. John's in the Wilderness is an ancient oasis of calm on the edge of the town. Exmo_20 would destroy this, drastically altering the peaceful setting which currently exists. This is contrary to POLICY HE02.

Exmo_20 is on the rainwater catchment area of Withycombe Brook. In the 1960s the area of Exmouth known as The Collony, parts of Exeter Road and the lower parts of adjacent roads such as Withycombe Road and Park Road were flooded twice in quick

succession, causing much damage and loss. This flooding was substantially caused by the run off of surface water down the Withycombe Brook valley. Exmo_20 would exacerbate the flood risk which already exists. This is in conflict with POLICY AR01B

Exmo_20 is isolated and people would have to travel much further than 800m to access existing key services and facilities, contrar to PARAGRAPH 11.6 It is too far from any town centre and too steep for people to choose eslking or cycling as their mode of transport. This is contrary to POLICY TR01 and it would increase reliance on car travel, thus increasing traffic congestion, in conflict with PARAGRAPH 11.2

The main access point to Exmo_20 is much closer to Budleigh Salterton than it is to Exmouth, making Budleigh its most convenient and accessible town so the services and infrastructure of Budleigh such as shops, Doctors leisure and sporting facilities would be the obvious first choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth contrary to POLICY OL05 of the Local Plan,

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Ideally Exmo_20 should be removed from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sian Parker

Full name: Sian Parker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access site via Southern Wood. Southern and Meadow view road are not adequate enough to maintain the volume of increased traffic.

The recent impact of temporary traffic lights when gas was being updated caused congestion from Dinan way entrance and into meadowview, tailing back and around meadowview road and that was with just the number of cars that streets have now.

The removal of all trees from the brook area of Southern Wood will be a breach of the Forestry commission license.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The direct effect to us as residents.

Denise Christine Parker

Full name: Denise Christine Parker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan Do not access the site via the B3179 Do not access the site via Southern Wood Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Michael Parkin

Full name: Michael Parkin

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Representation to the Regulation 19 consultation on the East Devon Local Plan 2020-2042,

This representation concerns: The strategic Policy SD23 Development allocation at Otterton Land north of Behind Hayes (OTTO-01)

Relevant parts of the local plan:

Our Outstanding Historic environment

Land north of Behind Hayes (Otto-01)The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the northwestern part of the site is not appropriate for built development. The land should be kept open and made available as a community open space/orchard or similar use. Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets. Vehicle access needs to be to the east/Orchard Drive.

Policy HEO3: Conservation Areas

B. Requirement: take in to account important views within, into or out the Conservation area and show that these would be retained and unharmed;

E. Be sympathetic to important spaces such as paddocks which make a positive contribution to the pattern of development in the Conservation area.

My submission to EDDC

I welcome all of the above restrictions but feel that they do not sufficiently protect the important and only view of the conservation area looking from the south towards the north. Please note : the developer is already surveying the whole of this paddock, including the south and west, and the whole of the second smaller paddock to the east.

The field gate, in Behind Hayes, alongside the property EDZEL, provides the only public view of the conservation area, from the south. From the field gate there is a perfect landscape view across the paddock, to the village, the conservation area and, to the right, the plantation of sycamore trees with Anchoring Hill and the landscape beyond.

Although not open to the public, this paddock is a huge amenity for the village. Families bring their children to watch the sheep and lambs grazing in the orchard, just as they have done for centuries before. Visitors to the village and walking groups all stop at the gate to take in this beautiful view. The paddock also has a few remaining ancient cider-apple trees which still produce a large crop every year. It is also worth mentioning that the field gate is the historic entrance once led to a “roadway” which ran all the way down to the main road. This is shown on the Tythe Map from 1844.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: My request to the Local Plan Team

In order to protect this heritage view and taking account of Policy HEO3 part B and E, the only alteration I would ask to be made is to add a few words which are shown in red below.

Land north of Behind Hayes (Otto-01) The site is allocated for 10 homes. There are significant heritage and landscape constraints at this site and the northwestern part of the site, and the southwestern part of the site, including the historic view over the conservation area, from the field gate in Behind Hayes, is not appropriate for built development. The land should be kept open and made available as a community open space/orchard or similar use. Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets. Vehicle access needs to be to the east/Orchard Drive.

Helen Parr

Full name: Helen Parr

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.1

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.:

2.10. “ Supporting jobs and the economy” Where is the employment provision for the development proposed in Colyton?

Full name: Helen Parr

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.6

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.: What studies of local communities' needs have been carried out? What were the criteria for assessing a community's needs? What study of Colyton's "needs" has been published, apart from the Devon Communities Together 2022 "Housing Needs Report" which looked into the need for Affordable Housing in Colyton? How was open market housing "need" in Colyton assessed?

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.:

Define "modest" Define "needs"

Full name: Helen Parr

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.8

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.:

2.8 “ New expanded and improved... alongside development” What assessments of community infrastructure needs have been carried out eg. for primary education provision including at Colyton? When will the Water Cycle Study, be published? Confidential Draft sent to Councillors July 2024 Sewage system in Colyton inadequate, no capacity to support development.

Full name: Helen Parr

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.2

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.: Chap 3 The Spatial Strategy

3.2 The NPPF...reduce travel needs and offer transport choices.” Colyton is not a sustainable location and will necessitate travel Bus services to Colyton inadequate- The nearest station is Axminster, 5 miles away. bus ride 12 minutes, departures every four hours Monday to Saturday. Sunday? taxi 9 minutes

Development will result in travel for Secondary School- eg to Axminster, Lyme Regis, Sidmouth Employment, Supermarket- nearest is Seaton, 3 miles away, 12 minutes by bus). Hospital- Exeter 25 miles away, bus 1 hr. 13 mins Dentist- Seaton

Bethany Parr

Full name: Bethany Parr

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Exm_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

- ??Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality" (East Devon Pebblebed Heaths SAC/SPA).

- EXM_20 is in conflict with POLICY OL09 and POLICY PB04.

- EXM_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. I am also concerned about the sewage situation as the sewers are already struggling leading to illegal discharges into the rivers and sea.

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The one lane road through Woodbury will not cope with this level of traffic. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

- The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents. It is proposed as an Exmouth development but in reality will detrimentally impact Budleigh and Woodbury.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Significantly reduce the size of the development proposed, and increase local infrastructure/ roads/ sewers to cope with the increased pressures. The entrance to the site should also be repositioned away from Pebblebedheaths.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Helen Parr

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Chap 5 Development in the Towns and Villages

SD09 Development allocations at Colyton- Land at Hillhead(Coly 02) 49 houses
Objection- No employment provision Approach roads narrow, largely single track. Risk of effect on bats at Beer Quarry and Caves SAC Inadequate sewage system Primary School provision at Colyton and Seaton inadequate to accommodate expected numbers of children this development will generate.

Land adjacent to the Peace Memorial Playing Fields (Coly 06a) 12 dwellings Objection- No employment provision Part site in flood plain of River Coly. Site has been earmarked by CPC for a new school for over 20 years, is a central site, has two car parks, space for sports and play space on the Peace Memorial Playing Fields, and is next-door to the Preschool Nursery and Youth Centre. The existing school site is landlocked and children are being taught in mobile classrooms. This site could be sold and developed for housing which would part fund the new school.

David Parry

Full name: David Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed.

Full name: David Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: NA

Full name: David Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: NA

Full name: David Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: NA

Full name: David Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: NA

Alison Parry

Full name: Alison Parry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Over development of Exmouth, with no increased infrastructure

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As the builders,/developers will not increase the amenities required for Exmouth, to support this mammoth residential build

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To oppose the build, of the residential housing and the destruction of a cul-de-sac, as a through road? LOCAL AUTHORITY *** Personal details have been removed ***

DATE: 9th March 2025

Dear Sir

I am writing to object to the planning application ref: EXMO20a/20b St Johns, concerning the proposed new housing scheme, of (700 homes) with site access through Southernwood, (currently a Cul-De-Sac) and Meadow View Road. Having been at 1 Southernwood since July 1994, we feel that the planned access through the Cul-de-sac will have a detrimental impact on Lower Veiges Plantation, mainly on the wildlife in this area, covered under the Wildlife Countryside Act 1981, the habitat of various protected species in this area.

So we wish to object to the aforementioned application based on the following grounds.....

Wild Orchids “The Wildlife and Countryside Act of 1981 protects wild orchids in the UK under Section 13, which makes it illegal to intentionally uproot or destroy any wild plant without permission”

Yellowhammers Protected under the Wildlife and Countryside Act 1981 “Conservation status, Yellowhammers are a UK Birds of Conservation Concern Red List species. Their population has declined by 54% between 1970 and 2015. This is due to a number of factors, including the removal of hedgerows, the loss of winter stubbles, and the efficiency of modern farming machinery”

Otters Protected under the Wildlife & Countryside Act 1981, plus Conservation of Habitats and Species Regulations 2017 – “Planning authorities must consider the conservation of protected species and habitats when reviewing planning applications. Depending on the potential impact of the development, the planning authority may require a survey to be undertaken”

Bats - in the UK are protected by law as European protected species (EPS) Legal protection- Legislation dictates that any structures or place which a bats use for shelter or protection are protected from damage or destruction whether occupied or not. This legislation has been incorporated into planning policies. This means that planning authorities have a legal obligation to consider whether bats are likely to be affected by a proposed development.

Ring Necked Parakeets – Protected by the Wildlife & Countryside Act 1981, these birds have been seen roosting and flying the with many magpies, they are now breeding successfully in the Veiges Plantation area This is just a very small list of animal/plants on the protected list to be found in the vicinity of Southernwood brook. Cul-de-sacs were designed for a small number of properties to enjoy quiet, safe area for outside play for children with low vehicle emissions, low traffic and most of all low traffic noise, this was the main decision in our choice for buying 1 Southernwood. The use of access through Southernwood (currently a Cul-de-sac) would increase: Excess pollution, excess noise, road surface damage, parking restrictions, a dangerous area for residents and dog walkers, desecration of the wildlife and the brook, loss of privacy, highway safety, nature conservation The residents and community residing under the proposed housing scheme feel strongly that this extensive housing development will also be affected due to the lack of infrastructure missing from Exmouth, SWW unable to support the area, due to the continuous failure of the current waste pumping stations, no fully managed Police Station for the excess crime that will incur, failure for new Dr surgeries, and waiting times for appointments will increase, we have no hospital, a problem with the NHS dental system, and most of all a necessity for a new infant and junior schools, not forgetting more nursery’s for the 0-5 years to now accommodate the Governments free early years placements.

Regards *** Personal details have been removed ***

Full name: David Parry

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.: In the Exmouth Sites climate change carbon emissions commentary (p.335), a figure of 1,600 metres is used, this should be 800m as the 1600m is total trip 'there and back' [All links reference on p.186 of the Local Plan are broken/out of date but the Government's National Design Guide does states 800m. "Sustran, Walkable neighbourhoods" also states 800m as standard walkable distance and 1600m total trip]. Distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. As the main site access point is now out onto the B3179 country road, this should be a material consideration in this section. This site is not in a sustainable location and its allocation is therefore not consistent with national policy. Other sites, shown as preferred within the Agenda for the 3rd September Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Hywel Parry-Jones

Full name: Hywel Parry-Jones

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

RESIDENT'S RESPONSE TO EAST DEVON LOCAL PLAN – 2020-2042 The East Devon Local Plan 2020-2042 document is an impressive piece of work in terms of scope and presentation. At 270 pages long this document is quite a challenging read for residents. I have concerns about some aspects that are woven into the sections on development in towns and villages, sustainable transport and landscape as they apply to the Exmouth area. The total number of houses to be allocated to East Devon is quite staggering - 2634 houses for Exmouth and Lympstone. The Plan does not clearly articulate why so many houses are required. It may be the new government policy to increase housing supply but there is no evidence of the council challenging the figures. Based on previous government's housing calculations that were applied around 15 years ago these must be considered as is suspect. The proposals for development at the West End and the possibility of a new community towards the Airport/Cranbrook makes sense but the worrying issue is the unrealistic plans for local communities and degradation of open countryside. Such an exponential increase in housing will be to the detriment of existing residents who will see their quality of life significantly degraded. The shortcomings of the A376 linking the Exmouth area to the M5 motorway and Exeter appear to have been omitted, as this issue has been for the past 50 years. This road is quite inadequate for the traffic flows resulting from current exponential housing developments, before additional transport resulting from proposed developments takes to the roads. It is amazing that the Highways Department in DCC continues to support housing development proposals. The prospect of not being able to do anything about this key transport artery should halt future major housing development in the Exmouth area apart from minor infill sites until road access is improved. Some of the issues raised here are equally applicable to encroachment into the green belt and the open countryside in other locations in East Devon. As a resident in Lympstone parish my focus is primarily on site Lympstone_07 because there is considerable history linked to this site going back some 15 years. It is an example of how the council has chosen to bypass the long-standing views of residents, the Lympstone Neighbourhood Plan and a

previous ruling by the Planning Inspectorate in 2015. Site Lymp_07 In selecting this site as suitable for Housing and Employment, East Devon District Council may have misinterpreted the provision of the National Planning Policy Framework (NPPF). Although this document was updated with minor changes by the incoming Labour Government, it did not change the protections afforded to green belt and development in open countryside. The site is not within the defined settlement boundary and is an example of inappropriate development. This site has been the subject of a number of planning applications, all of which were turned down during the period ca. 2010 to 2015. In this respect, the arguments against development have been well articulated and available in the public record. It is appropriate at this stage of the EDLP process to reinforce why the council should not have selected this particular site as suitable for Housing and Employment. The reason are:

- Location. Lympstone_07 sits in the middle of the green wedge between Exmouth and Lympstone Village. It therefore falls into the category of ‘open countryside’. The NPPF is very specific on development in the green wedge. In no way can this site be considered as grey-belt, which might have permitted the council to designate this as a site for development. By including this site as effectively in Exmouth the council is using this as a subterfuge to boost the housing totals for Exmouth.
- Land Quality - the fields are classified as Grade 1 Agricultural Land. These are the only tracts of land with this categorization remaining in the Exmouth area. Dating back to the tithe maps of the 19th century, the land has been used for arable crop -production such as barley, hay crops, pasture for stock-rearing and latterly maize; it has been cropped with maize for the past decade. It is not ‘only just used for maize’, as stated by a contributor at the strategic planning meeting, suggesting that this is not a valuable agricultural land. Maize is grown because it comes second in value to wheat crops. For this reason, the land owner has stipulated that the farmer who manages the land must grow maize exclusively. Were this directive not in force, the land could be used for wheat and barley as happens of the adjacent field to the north of the site boundary, and be subject to a crop rotation pattern which is best farming practice. An attachment (1) demonstrates the versatility of the land, a factor that reinforces why it should continue as productive agricultural land, rather than having houses planted in it. In the context of UK food security, this type of agricultural land should not be used for housing, particularly when the EDDC had other option of inferior land offered up by landowners for consideration. Environmental and Sustainability Versatile and very productive land. Conflict with 3.35 -3.37 Grade 1 agricultural Land
- Environment. Situated on the watershed above the Watton Valley, Site Lympstone _07 sits atop the watershed draining down the south flank of the valley. These fields hold a significant amount of water which, if built on, will impact flows into the Watton Brook in times of heavy rainfall. These events are increasing in frequency and intensity over the

past few years and will continue with increased infrequency with climate change. Images at attachment 2 illustrate the amount of water that accumulates on the fields and adjacent East Devon Way that passes between two of the fields during persistent heavy rain. Being on a high point, the site used to be visible from all directions. The development company that owns the land screened the fields with trees some 10 years ago to deal with the issue of visibility commented on by the Planning Inspector's report. The outstanding views over the Exe Estuary towards the Hadon Hills and the high ground north of Exeter are illustrated in the panorama at attachment 1. The trees are not protected ancient woodland and inevitably the narrow bands of conifers will be harvested if the site is developed in order to afford outstanding views to the high-value properties that will inevitably cover the site. The land functions as a conduit for wildlife, such as deer, badgers and of course foxes as illustrated in attachment 3.

- Sustainability. The site will not score highly for sustainability. There will be significant reliance on cars as residents go about their daily business. The site has been earmarked as having potential for 100 houses. This will result in somewhere in the order of 150 vehicles which will add to the flows along the A376, not including the vehicles that will provide essential services. It is wishful thinking that people will abandon their cars and opt for more environmentally means of transport to commute, shop, take children to school and go about other daily business - it just won't happen. Topographically, the site is not ideal for those of a less energetic disposition. It is 2 miles from Lypstone Village and Exmouth respectively. The site is reached in all directions by a gradient that increases from sea level to 150 feet. Typical of roads in Devon some of the gradients are gradual, interspersed with more challenging sections, particularly for cyclists. A Stagecoach bus route passes along the A376 adjacent to the site in theory every 20 minutes. The reality is that there are frequent delays due to volume of traffic on this road, particularly during rush-hour. This unreliability, combined with a time-challenged younger population is not conducive to persuading residents to rely on this service for commuting, school runs and specific appointments. Site Exmo_23 This site is also located in the green wedge and many of comments made in relation to Lypstone_07 apply. This is also a site that has been the subject of several planning applications that have been turned down, so the key objections to development are well documented. Adjacent to the National Trust land at Lower Halsdown Farm, any development would not be in keeping with the grain of existing properties in Courtlands Lane and will be visible from the south westerly direction, the coastal preservation zone, and will undermine the guarantees of the Coastal Preservation Zone and the Devon Landscape Assessment. Development will significantly increase traffic movement along a narrow country lane which is already inadequate for the volume and speed of vehicles using it and it affects the safety of residents and pedestrians using the East Devon Way. In the light of these issues that have been somewhat glossed over to justify the selection of these controversial sites, it is hoped that the Inspector will have a different perspective

when he examines the detail relating to Lympstone_07 and Exmo_23, - hopefully backed up by a site-visit. Sustainability and Transport - Infrastructure A resident in Exmouth area for 50 years, in that time I have observed housing spill into the open countryside. This has not been in parallel with improvements in infrastructure. A major factor that should have inhibited development is the inadequacy of the roads radiating from Exmouth, particularly the A376. (I have failed to find a specific section relating to the A376 in this Plan using a word search, but I concede that it may be covered in a less transparent manner.) It is not possible to make any improvements to the road between the edge of Exmouth and Clyst St George. It is puzzling why the DCC Highways Department has never ruled that more housing should not be approved particularly in the context of the number of houses being proposed by the current plan. Assuming that every new house will have 1.5 cars this will lead to a significant number of vehicles on the roads. There are insufficient local employment opportunities for the number of houses proposed, so most people will commute to Exeter and other location in Devon and west Somerset. The topography of the Exmouth area persuades people to use their cars rather than use other means of transport. Other aspects of infrastructure require attention before any more development occurs. The sewage system is quite inadequate as witnessed over the past 9 months. Schools are under pressure as are the medical facilities. It may be relatively easy to construct the infrastructure but the means to find enough suitably qualified professional staff is much more challenging. Conclusion With proposals to expand Cranbrook and the prospect of a new community it should be unnecessary to approve development in the open countryside in the vicinity of towns and villages in East Devon. The number of additional houses proposed is quite extraordinary and most residents are already concerned about existing development and the impact on infrastructure, particularly the very unsatisfactory and overwhelmed road links. The council must resist pressure from developers who I suspect have already exerted pressure on the council to include the controversial sites. Once valuable agricultural land is built on it is lost forever.

Philip Parsons

Full name: Philip Parsons

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 12.6

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.:

Although the document correctly writes down the policy. The planning department and committee have not followed this in the way they put together the emerging plan. Their behaviour was at best following the old legislation and not “seek to further” the AONB. As an explanation I found the following regarding the recent changes to the legislation with respect to AONB or National Landscape:

In December 2023, the legislation was updated to:

“In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”

What does this actually mean?

The changes to AONB (National Landscape) legislation may seem minor but it's actually quite significant. Whilst the previous duty – to “have regard to” – was a passive duty, the new duty – to “seek to further” – is an active one.

In practice, the previous duty only really required relevant authorities* to take impacts on the AONB (National Landscape) into account. By contrast, the new duty expects

them to proactively take steps to positively conserve or enhance the special qualities of the AONB (National Landscape).

*relevant authorities include local councils, local planning authorities, highways authorities, county councils and more.

Natural England has written to AONB (National Landscape) Teams throughout the UK to advise them about what the changes to AONB (National Landscape) legislation mean in practice. DEFRA is also expected to publish further guidance shortly. Natural England's advice letter includes:

The new duty to “seek to further” is an active duty, not a passive one. Relevant authorities must take all reasonable steps to explore how the natural beauty of the AONB (National Landscape) can be conserved and enhanced. The new duty goes beyond mitigation, like-for-like measures and replacement. Relevant authorities should take measures to avoid and mitigate the effects of development. Those measures should be appropriate and proportionate to the type/scale of development. They should also be in line with the AONB (National Landscape)'s management plan. In all cases, the relevant authority must be able to demonstrate how they have actively sought to conserve and enhance the natural beauty of the AONB (National Landscape). And this should be open to scrutiny.

It is plain to see that East Devon County Council has not followed this instruction , for example in proposing the land at Sidbury for developing 43 new dwellings. They were behaving as though the old legislation was in place in only mentioning some minor mitigation measures on the harm of this potential development. This is surprising as the legislation is clearly referenced in Chapter 12 of the emerging local plan “Our Outstanding Landscape”.

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape 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.: They need to be

stating what they are doing proactively to enhance and preserve the National Landscape. It needs to be proactive, not a reactive policy.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: They do not demonstrate with evidence what is being done to enhance the national landscape , AONB, and what proactive measures are in place to, or being put in place, to do this.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter 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 Landscape chapter sound. It will be 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 needs a major modification, not just a few words amended. There needs to be a complete, well thought out strategy and an actionable plan on what the council is planning to do to enhance the National Landscape in Devon.

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I can't see any mention of National bodies that have cooperated in putting this plan together.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate 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 the council has demonstrated how they do not follow the updated legislation, I would like to be reassured that they listen to our concerns, and understand their legal responsibilities.

Full name: Philip Parsons

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: It is not legally compliant with the designation of National Landscapes, Specifically, section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 now requires all public bodies to ‘seek to further’ the purposes of protected landscapes. Only local authorities or the Secretary of State can give permission for development in, or affecting, an AONB. As a local authority, you must make sure that any proposals seek to further the purpose of conserving and enhancing the natural beauty of the AONB, for example when: adding utility services, like gas pipes and telecommunications cables or creating public access as part of rights of way improvement The local plan document Strategic Policy OL02 states that the highest level of protection will be given to the landscape and scenic beauty of the National Landscape in East Devon. The site in Sidbury is completely inside the National Landscape. Development in a NL will only be permitted where it avoids harm and contributes to the protection , conservation and enhancement of the special qualities , character and natural beauty of the NL. When discussing the local plan or in the document of the emerging plan there is no mention of how this site being developed with 43 dwellings would either avoid harm or contribute positively to the landscape. In fact it is plain to see that it would cause harm, and a recent planning application admits this in their planning application.

Not only does this site not meet the requirement of policy OL02, in the planning committee meetings it was never discussed or considered. There was mention of restricting the development to a smaller area to reduce the harm to the landscape, but this was reversed later to include the whole site around Furzehill Farm at the request of the developer. The committee mentioned developing the lower portion of the site to reduce the visual impact, but this does not “seek to further”, it is only admitting that harm is being done to the landscape and the committee talked about measures to

reduce that harm. This is clearly in contradiction to the Levelling Up and Regeneration Act 2023.

Furthermore in policy OL02 it states that major development in a NL will be only permitted in exceptional circumstances and where it can be demonstrated to be in the public interest. Again in the local plan discussion it was not mentioned or discussed how this site being developed would be in the public interest, or what the exceptional circumstance was. The committee failed in its duty to consider this in suggesting this major development of 43 dwellings inside the National Landscape. A recent application on this site has been objected to by the National Landscape Department of the council for this very reason.

As an explanation I found the following regarding the recent changes to the legislation with respect to AONB or National Landscape:

In December 2023, the legislation was updated to:

“In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”

What does this actually mean?

The changes to AONB (National Landscape) legislation may seem minor but it's actually quite significant. Whilst the previous duty – to “have regard to” – was a passive duty, the new duty – to “seek to further” – is an active one.

In practice, the previous duty only really required relevant authorities* to take impacts on the AONB (National Landscape) into account. By contrast, the new duty expects them to proactively take steps to positively conserve or enhance the special qualities of the AONB (National Landscape).

*relevant authorities include local councils, local planning authorities, highways authorities, county councils and more.

Natural England has written to AONB (National Landscape) Teams throughout the UK to advise them about what the changes to AONB (National Landscape) legislation mean in practice. DEFRA is also expected to publish further guidance shortly. Natural England's advice letter includes:

The new duty to “seek to further” is an active duty, not a passive one. Relevant authorities must take all reasonable steps to explore how the natural beauty of the AONB (National Landscape) can be conserved and enhanced. The new duty goes beyond mitigation, like-for-like measures and replacement. Relevant authorities should take measures to avoid and mitigate the effects of development. Those measures should be appropriate and proportionate to the type/scale of development. They should also be in line with the AONB (National Landscape)'s management plan. In all cases, the relevant authority must be able to demonstrate how they have actively sought to conserve and enhance the natural beauty of the AONB (National Landscape). And this should be open to scrutiny.

It is plain to see that East Devon County Council has not followed this instruction in proposing the land at Sidbury for developing 43 new dwellings. They were behaving as though the old legislation was in place in only mentioning some minor mitigation measures on the harm of this potential development. This is surprising as the legislation is clearly referenced in Chapter 12 of the emerging local plan “Our Outstanding Landscape”.

This land in Sidbury should be removed from the emerging local plan and not be adopted into the future local plan as it clearly does not comply with current legislation.

I am more familiar with the site at Sidbury as I live there, but I suspect the deficiencies of respecting the national landscape may also be relevant to other sites in the emerging local plan in protected sites.

These comments are from myself, and also supported and agreed with my neighbours Mr and Mrs C Ryan

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the land in Sidbury from the document. Additionally there might be other sites within the AONB that should also be removed as the council did not follow the law with regard to the National Landscape.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To be a sound decision it should be made on solid evidence and be the most appropriate when compared with other options.

The debate about this site being adopted into the emerging plan was superficial at best. The planning committee failed to debate or consider whether this was an appropriate location for a major development and how it could contribute to the National Landscape. There was insufficient data available to make the required decision. For example this site had serious questions about the validity of a safe access and how to alleviate the occurrence of frequent flooding in the area. The county highways had not given an expert opinion or examined the issues at the time of the meeting. The committee made assumptions that the issues could be solved without evidence with regard to the access safety or the flooding issues. Subsequently it has been confirmed that the site could not use road drains to the run off from the site, which makes the development highly questionable in terms of affordability or sustainability. The highways authority has still not investigated whether the proposed access onto the A375 could be viable, with the Town Council and residents clearly arguing that an access onto a narrow main road with blind corners would represent a serious safety risk to cars, bicycles, pedestrians and other road users (the road is not wide enough for two large vehicles to pass at this point). There was confusion as to why a larger site had been put forward on the emerging plan. At the first meeting it was decided to only consider Sidm-34a so as to keep a break between two existing developments. The developer lobbied the planning department and at the second meeting the plan then showed the complete site (34a and 34b) to be on the emerging plan. This was a surprise to all those at the meeting as it had never been discussed or put forward at the formal committee meetings. It was not following the approved process to allow private lobbying to make changes to the committee's output.

The other major failing is that the council process never made any attempt to compare sites, it was a simple go / no go discussion for each site. Even more damning at the end of the session when they realised they did not have enough sites to make their “target” they revisited sites which initially had been rejected, looked at them with lower thresholds, and then approved them to go forward. In developing a plan it would be expected to rank different locations for the suitability of development. Each site could be ranked with various criteria to establish which sites should take priority in being put forward to a local plan the meetings and the document makes no mention or attempt to rank or prioritise one location from another.

Effective the policies need to be achievable and deliverable in the next 15-20 years.

The site considered in Sidbury is inherently challenging. The agricultural fields are on the side of a valley and very steep. It is mainly composed of non-porous clay and has many streams flowing from the surrounding hills. The run off goes currently to a constrained mill leat that was built in the Middle Ages to supply the existing working water mill. There is a history of flooding to the surrounding properties and roads. Traditional methods for alleviating run off issues are ineffective due to no soak away possibilities (impervious soil) and no existing man made drainage solutions. The main road would require upgrades to allow for a safe and viable access to be built. To develop such a challenging site would require a great deal of investment, and there is no evidence that it would be economically viable to develop this site. To back this up a developer has already indicated that they could not make the site work with the affordable housing requirement as these are less profitable to build.

Finally the question is whether the selection of this site would be in line with national policy . As already mentioned the site is not compliant with the need to “seek to further” the National Landscape. Also it will not be compliant with the policies of building more affordable homes due to the large investment needed to turn these steep agricultural fields into a building site. These comments are from myself, and also supported and agreed with my neighbours Mr and Mrs C Ryan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the land at Sidbury from this emerging plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: For example There has never been any mention or discussion about transport links to Sidbury which would require cooperation from other councils. For example better bus links to Exeter would be critical, but never considered.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The council have failed to perform due diligence in assessing potential sites with data and evidence based decisions, and failed to follow section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023. I have made previous statements at the committee meetings but never felt listened to as a member of the public. I feel it is important to be able to represent these points in person to an independent body and gain confidence in the process.

Alistair Rice & Nita Patel

Full name: Alistair Rice & Nita Patel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The allocation of Sidm_31 and its access via Windsor Mead is based on a late, superficial and incomplete consideration by the Highway Authority (Devon County Council), which has not been subject to public consultation until this stage. The Highway Authority's justification for use of Windsor Mead ignores any consideration of the junction of Windsor Mead with the A3052, which does not meet the requisite standards set out in the Manual for Streets (Off et al 2007) in respect of minor arm visibility splays, which are less than 10m.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy SD06 Sidm_31 should be removed from the Local Plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The recommendation to access Sidm_31 via Windsor Mead has ignored the poor (less than 10m) minor arm visibility splays, which do not meet the minimum criteria set out in Manual for Streets (ibid). A link between Sidm_31 and Windsor Mead cannot be achieved without the purchase of land from two Windsor Mead properties; if these plots cannot be secured by negotiation, the local authority would need to use its CPO powers on behalf of the developer

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy SD06 Sidm_31 should be removed from the Local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Yes, but the recommendation to access Sidm_31 via Windsor Mead was inserted into the Regulation 19 Local Plan on the basis of an '11th-hour' email exchange between EDDC and DCC, which means it is not being subject to scrutiny until now. Not good.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mark Paterson

Full name: Mark Paterson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Although I am not completely sure if this will be a legal factor, it is worth noting. This land has been designated as Land of Local Importance. That designation is there for good reason — to protect green spaces that matter to the community and the local environment. It helps preserve the rural character of Whimble and offers a valuable green buffer that contributes to the wellbeing of the village. Allowing a development on this land would completely undermine the purpose of that designation.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Flood risk is a major issue. The field is often waterlogged, and the stream at the bottom of the site has overflowed several times this winter alone — something that's happening more frequently in recent years. Building houses here will only increase the problem, pushing excess water into the surrounding area and raising the risk for existing homes. It's hard to see how this could be considered a safe or sensible location for development.

The environmental impact also can't be ignored. The site is home to a number of mature trees — including a historic oak — several of which are protected by Tree Preservation Orders. The area is also used by protected wildlife, including bats and otters, both of which have been regularly seen near the stream and surrounding fields. Any development here risks destroying habitats and putting protected species at risk.

Importantly, this land has been designated as Land of Local Importance. That designation is there for good reason — to protect green spaces that matter to the community and the local environment. It helps preserve the rural character of Whimble and offers a valuable green buffer that contributes to the wellbeing of the village. Allowing a development on this land would completely undermine the purpose of that designation.

Traffic, however, is the issue that worries many of us most. Whimble's roads simply aren't built for this kind of increase in cars. The centre of the village has several narrow pinch points where only one car can pass at a time. There are very few pavements, making it risky for pedestrians — especially children walking to school, families with pushchairs, and older residents. We already deal with congestion at busy times, and it's hard to see how 33 houses — and the associated cars — won't make things significantly worse.

In particular, Talaton Road (and the roads feeding into it) would become even more congested. It's effectively a single-track road, already difficult to navigate when there's two-way traffic or delivery vans. Adding more vehicles to it is a serious safety risk — especially considering it's used by farm vehicles, cyclists, and walkers as well.

Cranbrook, just a few miles away, has been purpose-built with this kind of expansion in mind. It has wider roads, proper pavements, schools, shops, and services that are designed to accommodate more housing. Whimble simply doesn't — and trying to force that kind of development into a rural village setting just isn't sustainable.

In short, WHIM_11 isn't the right plan for Whimble. It puts pressure on roads, local services, and the environment — and goes directly against the protections in place for this piece of land. I hope the Council will continue to listen to the community and reject the proposal.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: With near misses around the area of Whimble Primary School being a regular concern, such an increase in traffic for the local population would likely require a one-way traffic management system to be formally introduced on School Hill. Building over 30 new houses (and probably adding 40-50 new cars) at Whimble_11 and significantly increasing the weight of traffic in mornings and evenings to/from the northern side of the school completely defies logic.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

The environmental impact also can't be ignored. The site is home to a number of mature trees — including a historic oak — several of which are protected by Tree Preservation Orders. The area is also used by protected wildlife, including bats and otters, both of which have been regularly seen near the stream and surrounding fields. Any development here risks destroying habitats and putting protected species at risk.

Importantly, this land has been designated as Land of Local Importance. That designation is there for good reason — to protect green spaces that matter to the community and the local environment. It helps preserve the rural character of Whimble and offers a valuable green buffer that contributes to the wellbeing of the village. Allowing a development on this land would completely undermine the purpose of that designation.

Traffic, however, is the issue that worries many of us most. Whimble's roads simply aren't built for this kind of increase in cars. The centre of the village has several narrow pinch points where only one car can pass at a time. There are very few pavements, making it risky for pedestrians — especially children walking to school, families with pushchairs, and older residents. We already deal with congestion at busy times, and it's hard to see how 33 houses — and the associated cars — won't make things significantly worse.

In particular, Talaton Road (and the roads feeding into it) would become even more congested. It's effectively a single-track road, already difficult to navigate when there's

two-way traffic or delivery vans. Adding more vehicles to it is a serious safety risk — especially considering it's used by farm vehicles, cyclists, and walkers as well.

Cranbrook, just a few miles away, has been purpose-built with this kind of expansion in mind. It has wider roads, proper pavements, schools, shops, and services that are designed to accommodate more housing. Whimble simply doesn't — and trying to force that kind of development into a rural village setting just isn't sustainable.

In short, WHIM_11 isn't the right plan for Whimble. It puts pressure on roads, local services, and the environment — and goes directly against the protections in place for this piece of land. I hope the Council will continue to listen to the community and reject the proposal.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Stephen Patrick

Full name: Stephen Patrick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to object to the Whim_08 plan for my village. There was always meant to be a green wedge between Whimble and Cranbrook, yet we already have an incursion within the village boundary of a travellers site you have approved. Now you wish to extend this to another 50 that could increase to near 180. There are also 1500 homes being built on the Whimble side of Cranbrook and even some of these could be within Whimble Boundary already.

This will greatly impact the villages rural setting and destroy the community feel with too many additional houses. It is fast becoming a suburb and losing it's village feel. Wildlife would also be destroyed if this goes ahead as planned. Should this extend into one of the historic orchards then it would also be destroying the history of the village and these orchards should be protected.

The roads are in no way adequate for such an increase either. The only route for people to access the shops, pubs and school would be down Church Road, and there are no pavements here and as such would increase dangers to pedestrians. The entrance to the village from the A30 has already seen an increase with traffic, including through traffic, and also has no paved area for pedestrians, with traffic travelling too fast. Increasing the amount of traffic to this extent would be plain dangerous.

Florence Pauly

Full name: Florence Pauly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach, etc.) would be the most convenient choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLIC OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

Nick Pearce

Full name: Nick Pearce

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: It is not a question whether it is legally compliant, which I am sure it is, but it is more about the overall plan.

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.: The plan for the west of the area is to build 10,000 dwellings. This is fine, we need more housing. But each of those houses will have a minimum of 1 vehicle and possibly more. The current transport infrastructure (A376, B3180 and A3052) is barely able to cope with levels of traffic today let alone an extra 10,000 vehicles. The levels of traffic now on a nice Saturday on the roads to Exmouth beach do not comply with your objectives. Objectives 2 - Net Zero, Objective 9 - Sustainable Transport and Objective 10 - Secure Infrastructure. Nowhere in this strategic plan is there way forward to cope with an dramatic increase in traffic.

I would like to suggest that to ease traffic going to Exmouth beach, a new park and ride is developed to replace Exmouth Town Football Ground. The ground could be moved to an out of town site. The station should be moved north to where the boat storage park is and then the whole issue of conflict between cars, pedestrians and cyclist can be solved. (Currently this is chaotic as you have pedestrians queueing for a bus across a cycle path, cars having to go a long way round to a train station).

I am not sure how Exmouth is going to work in the summer with so many more cars trying to get to the beach. Encourage the public to use a free park and ride rather than

expensive parking. Make the land train join up with the park and ride. Develop a clear, safe and direct route for cyclist to get to the beach. Make Queens Drive restricted access from the RNLI to Ocean. Make Rolle Street from Tesco Express to the Powder Monkey a pedestrian only to encourage less traffic. There needs to be a plan.

4. Do you consider that this part of the Sustainable Transport and Communications 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)

Christine Pearce

Full name: Christine Pearce

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located at an alternative site where it would cause no harm to the Pebblebed Heath(SAC/SPA).Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. It would fragment and destroy habitats and wildlife corridors ,contrary to Paragraph 13.23 of the local plan. Exmo_20 would increase the amount of traffic ,causing congestion.People would need to travel much further to existing key services and facilities,contrary to paragraph 11.6.The infrastructure is not there for schools,GPS etc . The Main Access point is in a dangerous position.No buses go this way.Everyone working in Exeter will drive through Woodbury causing a major increase in traffic and pollution.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mrs Susan Pearl

Full name: Mrs Susan Pearl

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This proposed development will cause harm to the countryside, the Pebbled heaths and I believe it is not in accordance with the strategy set out in Policy PB01. It will also ruin the 'dark skies' of the area and will destroy veteran trees, wildlife habitats and the hedgerows which are so essential to resident wildlife and air quality which I believe is contrary to Paragraph 13.9 Exmo_20 will increase traffic congestion on an already heavily used country road which is not suitable for the traffic it already has to carry. The services and infrastructure such as doctors, schools, and public transport will be insufficient for the extremely heavy load that this proposed development will impose on the area. Budleigh Salterton will be heavily affected and I believe the services the town has will be put at breaking point. The B3179 is the only road to get to Woodbury, Woodbury Salterton and Exeter and the Idea that cycling and walking routes would be developed is ludicrous considering that the majority of residents in Budleigh Salterton and over retirement age and cycling up a hill to get to key services is unacceptable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: My suggestion is that Exmo_20 be either removed from the plan or the size of the Exmo_20 be reduced dramatically or change the B3179 as the access. I also believe that a previous proposal of Exmo_20b would be preferable.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to see how Local Government discusses these proposals.

Roger PELLOW

Full name: Roger PELLOW

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This particular site would be difficult to develop and has many obstacles to building housing on it which would need to be sorted out. The site is in an elevated position within the village and will have a large visual impact on surrounding listed buildings and also the villages Heritage area. Also the site is very undulating with large contour changes. Due to the elevation of the site and the drop to current housing the risk of flooding is significant to established housing. From my property alone the drop from the site varies between 7 -14 meters. The other factors that need to be considered are the impact of light and noise pollution which at present there are neither. There are Bats in the surrounding trees that also need to be considered. Due to the exposed site any development need to be low profile such as Bungalows. Some properties sit at an elevated position in relation to the site and their foundations and gardens would need to be reinforced to avoid erosion.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All the properties below the the proposed development need to have protection against flooding. An area such as an Orchard with trees would help elevate flooding, incidentally the field was in the past an orchard. Any housing need to be low profile. Finally the Heritage properties and preservation area must not be impacted.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Not suitable due to impact on Heritage area listed buildings ! As elevated site. Severe danger and risk of properties below site of flooding ! Noise and light pollution will affect HUMANS AND BATS

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Look for another more suitable site in village

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Roger PELLOW

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This site is boarded by several properties that are listed and are in the a heritage preservation area.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site is in a very elevated position in relation to Heritage buildings and and development must be low rise and shielded from the properties

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sacha Pemberthy

Full name: Sacha Pemberthy

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Figure 2

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Yes

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 key facts have some critical omissions that are important context setters for the overall plan and further the averaging of incomes creates a misleading picture of the demographic to inform what type of housing is appropriate. This has continually led to large amounts of retirement housing built with no adjustments to infrastructure which is failing to meet the local population needs.

Specifically the introduction should include:

- the fact that the current sewage system is already well over capacity and any development would require significant investment in the system and should be predicated on such
- include a graph showing the distribution of income rather than average income and where the housing need is such that developers are focused on presenting plans that meet the actual need vs housing for wealthier pensioners
- include data on other critical local services namely GPs per head of population and school places so that again developers can consider this in their plans

I point you to the development of London Kings Cross where the development included a school and primary health care provision as directed by the local plan.

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.: I have included this in my comments above but for completeness in figure 2:

- include a chart showing the overcapacity of current sewage system and need for further capacity
- include a graph showing income distribution rather than average income
- include a chart to show type of housing need required
- include a chart to reflect capacity of key local services namely GP services and schools and transport links

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No as it does not refer to the issue of overcapacity of the sewage system and it also fails to set out the issues around capacity of other vital services and therefore who needs to work with any housing providers to ensure the appropriate infrastructure is in place.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sacha Pemberthy

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. Do you consider that this part of the Community Facilities chapter is legally compliant?: Yes

3. Do you consider that this part of the Community Facilities chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Community Facilities chapter is not sound. Please be as precise as possible.: In Policy CF01 it starts with the very weak 'encouragement' being given to creation of facilities. Given in Exmouth sites existing facilities are over capacity causing considerable strain on the community further development, particularly where provision is for elderly people moving into the area, provision MUST be REQUIRED for developers to invest in services. Further in provision you have no statements on utilities which are already overcapacity and under strain.

3(c). Please set out the modification(s) you consider necessary to make this part of the Community Facilities chapter sound, 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 sound. It will be 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 change the first sentence to:

'Require developers to conduct a community need and investment plan as part of their planning submissions. Plans failing to address how community needs will be met will not be approved.'

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.: The need for careful collaboration with NHS trusts on provision is absent from the policy. Similarly collaboration with South West Water

Full name: Sacha Pemberthy

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.4

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.: The assertion around Exmouth having a diverse job market and comprehensive local services is a flawed justification for the policy. The job market is largely seasonal in the tourism industry or minimum wage in care homes and it is important to reflect that. In terms of local services and infrastructure they are already massively over capacity so any further development only makes sense if clear provision of a new sewage treatment plant and upgrade of all sewage systems in put in place and local GP services have significant investment. Further with one road into Exmouth the traffic system for getting in and out is not fit for this level of development.

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.: It needs to be amended to change from saying Exmouth has a diverse job market to reflect the reality of most employment in Exmouth being minimum wage and much of it seasonal and also note that while there are a comprehensive range of services these are already over capacity.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There is no reference to the depth of collaboration that would be required in Exmouth for the development not to have adverse environmental and social impacts.

Full name: Sacha Pemberthy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Paragraph 2.9 refers to protecting the environment yet figure 3 shows over 1,400 new homes planned for Exmouth where existing infrastructure is already failing resulting in continual sewage overflows. This inconsistency in the vision means the vision is undermined and flawed from the outset. The vision needs to include specific reference to new sewage infrastructure as without that the situation that happened at Cranbrook will repeat.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Include a new 2.9 subsection a to reference requirement for upgrade to existing and provision of new sewage infrastructure and explain how the overdevelopment in Exmouth will be delivered without choking the environment and resources.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No ti does not set out just how essential cooperation with the water authorities is. Without a requirement to deliver updated infrastructure

hardwired into the vision the existing dire situation with sewage will become completely

untenable. Simply put NO houses can be built without this being delivered first and the plan MUST reflect this throughout. Anything less is a derogation of duty.

Full name: Sacha Pemberthy

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

2. Do you consider that this part of the Mitigating Climate Change chapter is legally compliant?: Yes

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.: Failing to require new housing to be built with solar panels and/or heat pumps is daft - it is much more cost effective to install at build stage than after and allowing plans to be approved without is simply letting developers cut costs and maximise profits at the expense of providing energy resilient homes.

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.: Change CC02 paragraph B to say all new housing should be built to incorporate renewable energy generation from solar panels and/or heat pumps to deliver at least 80% of average energy usage

Full name: Sacha Pemberthy

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

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(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.: If I am right that the prioritisation of housing needs is implied in the ordering of points A - F there is a fundamental issue in Exmouth at least of provision of housing for older people being prioritised ahead of housing for young people starting out. This is inconsistent with the need that is evident in the town and simply attracts more elderly people from outside of the area rather than meeting local needs.

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.: I would reorder the priority bullet points to move C and D ahead of B. Further it would be helpful just as % has been set for affordable housing that % of housing for elderly people is defined so that we don't have a continuation of McCarthy and Stone type of profit oriented developments dominating Exmouth and preventing sites being developed for young people. Having housing that is flexible with ageing vs elderly ghettos feels more attuned to creating vibrant and healthy communities

Full name: Sacha Pemberthy

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.: Paragraph 3.9 of the Sustainability appraisal fails to even list the significant ongoing pollution issues as a result of overcapacity sewage systems in Exmouth - given there is a major class action being pursued by residents and local businesses against South West Water due to the ongoing damage to business, tourism and the environment this failure to even mention it is shocking. It MUST be included as a separate bullet such that plans put forward are only approved if the sewage issues are addressed.

You have been provided with in depth detail on this issue by ESCAPE and failure to reflect this in the Sustainability Assessment and the Local Plan would be a serious derogation of duty.

Heather Pentel

Full name: Heather Pentel

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This would put a further strain on on both Exmouth and Budleigh Salterton for schools doctors dentists services roads sewerage etc

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Martin & Pam Perfect

Full name: Martin & Pam Perfect

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As residents requiring vehicular and pedestrian access via Windsor Mead to Sidford High Street, we understand that Devon County Council has recommended that a proposed development of 15 homes under the emerging Local Plan designated for the horse field between Burscombe Lane and Windsor Mead should be granted access via Windsor Mead, in preference to providing access via Burscombe Lane.

We would make the following observations re suitability of Windsor Mead to take extra traffic:

1. Windsor Mead is a thin estate road with awkward/substandard junctions serving its various offshoots, as well as providing access to the rear of Sidford High Street.
2. Vehicular passage is often impaired by inconsiderate parking on or near to its various junctions, and the lower part is regularly used for parking by residents of nearby Sidford High Street, visitors, delivery trucks and contractors working locally.
3. Access from Windsor Mead onto Sidford High Street westwards can be quite dangerous as there is an absence of visibility splay down the hill (to the East) due to a high bank. This means vehicles need to edge into the main road to see if the road is clear before they can proceed onto Sidford High Street up the hill in a westerly direction - this is a potentially a dangerous junction, especially as adherence to the 30mph limit is not exactly universal.
4. Similarly, vehicles trying to access Windsor Mead from Sidford High Street (from either direction) cannot proceed safely if there is a vehicle approaching the junction

down Windsor Mead - again this is potentially dangerous. Vehicles parked in close proximity to the bottom of Windsor Mead can pose an additional hazard.

5. Adding extra traffic movements emanating from 15 additional homes would, in our opinion, potentially exacerbate these current access problems.

6. The junction at the bottom of Burscombe Lane appears much wider, does not appear to have impaired visibility splay onto the main road in either direction, and currently provides access to far fewer residential properties than the Windsor Mead estate. Please take these observations into consideration in determining this part of the Local Plan, and confirm receipt.

Honiton Group Petition

Full name: Honiton Group Petition

Other party name (if relevant): On behalf of 80 residents who have signed the petition

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We are writing on behalf of over 80 local residents who have signed a petition opposing the proposed development in Honiton (Kings Road) under the Local Plan Strategy SD03. As concerned residents, we wish to formally object to this proposal due to significant concerns regarding road safety, access issues, environmental impact, and the overall well-being of the existing community.

Road Safety & Access issues: The proposed development raises serious concerns about increased traffic congestion and road safety risks. Kings Road is already under strain with existing traffic, and is often at a stand still with heavy commercial traffic, this is only exasperated during the summer months. The road has already given way previously and is often closed due to accidents. The additional burden of construction vehicles and increased residential traffic will exacerbate these issues. The incredibly busy road with limited access points make this area unsuitable for further expansion without significant infrastructure improvements.

impact on Residents' Well-being: This development will have detrimental effects on the mental health and quality of life of existing residents. The peaceful and scenic nature of this part of Honiton is a defining characteristic of our town, and its destruction will cause distress to many who rely on this environment for their well-being.

Environmental & Wildlife Concerns: The site in question is home to local wildlife that would be displaced by this development. The loss of green space will negatively impact biodiversity and the natural beauty that contributes to Honiton's unique character. The area serves as a haven for local flora and wildlife and any development will irreversibly damage these ecosystems.

Heritage and Visual Impact: The site's current landscape forms an iconic part of Honiton's identity as a historic market town. Any large-scale development risks undermining the town's rural charm, replacing it with an unsightly and inappropriate expansion that fails to respect the existing character of the area.

The EDCC Process. We are deeply concerned at the flawed process that this consultation has taken in relation to Honi-18. we first heard of the proposals 2 weeks ago in that time we have visited local homes and could have had many more signatures to this petition but there was such limited time to do this. Of the 80 people only 6 have known about the plans which reveals the extraordinary lack of openness and transparency that has marked the process. If this is not illegal then it is certainly cowardly and underhand and does no credit to EDCC- it will have served to alienate the local community. Every single person who has signed this petition was aghast at the plans and the way that they simply do not fit the area.

[Petition wording below]

Local petition to oppose the plan HONi-18 in the 2020-2042 consultation (under local plan strategy SD03)

We the undersigned oppose the Honi-18 plan for the following reasons:

1 This is an area of great natural beauty and should not be lost to new housing. Once lost it can never be recovered. Even though it is not officially designated as AONB it is clear to everyone that these fields are an integral part of the beauty of this area East of the A35.

2. There is abundant wildlife in these fields. Buzzards, peregrine falcons, woodpeckers, deer, heron, foxes, rabbits, badgers, magpie, crested newts, and many hedgerow birds including chaffinch bullfinches goldcrest. These need protecting in this stunning area.

3. The local infrastructure can not support more housing in this area of the town, As the roads are already overly busy and the plans for access to the proposed site are inadequate and dangerous given how steep , narrow and windy the road is above the junction to Waterleat Lane . This plan has simply not taken into account the disruption that the planned road layout will have on local people. The amount of traffic is already of great concern for local people and we see the plan for a junction above the Copper Castle as dangerous and disruptive. Anyone with personal knowledge of the road will know this is a very bad and substandard plan.

We protest most strongly that EDCC has not considered this aspect properly and is riding roughshod over the needs of local people.

4.This plan would greatly alter the feel and beauty of the north east end of the Honiton and thereby diminish this lovely old market town. It is this very reason that previous attempts to building housing in this area have been unsuccessful. We must not sell the soul of Honiton for short term and inadequate housing solutions.

5. The well-being and mental health of the residents need protecting as the area and the views are very important to their lives does the EDCC really want to exacerbate the mental health crisis in our society.

6 We want to register our deep unease and protest at the secretive process by which this consultation has been run. As stakeholders in the town we believe we should have been actively informed about the proposed plan which only appears to have become a live option In June 2024, and which many of the undersigned only came to know about it in March 2025 .

[text has been reformatted as the original version was a scan having been handed to reception as a paper copy original can be seen in the attached PDF blank pages have been removed for ease of reading]

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: For these reasons, we strongly urge the planning committee to reject to reconsider this area for proposal under the draft local plan and reconsider the long-term impact of such developments on the town and its residents. We request that the council gives due consideration to our concerns and prioritizes sustainable, community-led planning over unsympathetic urban expansion. There are several other locations highlighted in the draft plan such as the land to Cuckoo Down lane that is not directly impacting residents and has significantly reduced traffic. We appreciate your time and consideration of this objection and would welcome the opportunity to discuss this matter further.

It is our view that another site, one that is brownfield (or simply more appropriate) needs to be found. In this way the needs for more housing can be met but which does not undermine the town and the lives of those who live in the North-East of the town so harshly.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Amanda Pettit

Full name: Amanda Pettit

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
?EXMO_20

LOCATION ISSUES The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

NATURAL HABITATS Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICYOL09 and POLICYPB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

VEHICLE ACCESS AND INCREASED TRAFFIC FLOW Exmo_20 would increase the need for car travel, contrary to Figure7–the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

FLOOD RISK Development of Expo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified down stream flood risk . This is in conflict with POLICY AR018. This Area (Withycombe Brook through to Exmouth, which is already under the pressures. of climate changes.

HERITAGE PROTECTION Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Expo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jackey Phillips

Full name: Jackey Phillips

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment

area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying

land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key

services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is

contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan, ? Reduce the size of Exmo_20, ? Do not access the site via the B3179, ? Do not access the site via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mark Phillips

Full name: Mark Phillips

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Strategic Policy 07 is unsound for the following reasons. It ignores the Neighbourhood Plan, agreed by a majority (88%) of Broadclyst residents. The Neighbourhood Plan included new housing development commensurate with the size of the village, but SD07 goes way beyond this and is not appropriate for a village the size of Broadclyst. Although it has been suggested that Broadclyst must take some development, Broadclyst has already had huge development, specifically the settlements of West Clyst and Tithebarn, creating new centres of population. SD07 proposes further development alongside the main part of the village that would increase its size by about a third. EDDC stated that development above 70 homes would be “detrimental,” yet the current plan is for twice this number.

There are major traffic concerns. Development of this scale will bring a large number of cars, which the roads cannot cope with. The main route for Exeter or northward on the B3181 goes past Clyst Vale Community College, where there is a bottleneck. There is a section of road with no pavement which students have to walk along on their way to school, already it is dangerous and with increased traffic it will be more so, particularly at peak school/commuting times. The main route to London Road (for the Science Park, Exeter Airport, Honiton and M5) is Station Road; this is already crowded, with bottlenecks at Clyst Vale Community College and the bridge at Broadclyst Station, made worse by buses and the large number of haulage lorries. The route to Cranbrook is Crannaford Lane, which is narrow and mostly only a single lane, yet is already busy with large numbers of cars going between Broadclyst and Cranbrook, often at high speed. All access roads to the proposed site are thus stretched beyond capacity, and cannot take an increase in the number of cars. Also, the entrance to the site would

be from Whimble Road, which is narrow and cannot, in its present state, accommodate large construction vehicles turning in.

The SD07 site already suffers significant flooding, and development will exacerbate this problem. The problem of flooding in this area has been getting worse every year, and given the climate crisis, this trend may be expected to accelerate. Even if measures are taken to protect the site itself from flooding, it is likely that surrounding areas, particularly Town End, will be affected.

The village infrastructure cannot cope with development on this scale. The doctor's surgery is overbooked - it is extremely difficult to get an appointment with a doctor in the village, and there is no space for enlargement of the present facility. The primary school is full. Sewage is a major concern. There have been frequent leakages from the pumping station near Winter Gardens, and when there is flooding in winter it is common to see tanker lorries lined up to take away the sewage that threatens to overwhelm the sewerage system. The sewerage cannot cope as it is - more housing at this site would be completely unsustainable. It should also be pointed out that leakage will eventually find its way into the local watercourses; recent citizen science initiatives studying the River Clyst and the Crannybrook have shown high levels of phosphates (data from Westcountry Rivers Trust), and it is reasonable to assume that leaking sewage is at least partially to blame.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Modifications that would go some way to making the plan sound are:

Measures to address the traffic concerns, including but not limited to traffic calming measures on Whimble Road and Crannaford Lane, increased passing spaces on Crannaford Lane, a pavement on the stretch of Whimble Road by Clyst Vale Community College for children walking to school, a wide splay at the entrance to the site on Whimble Road to allow construction vehicles to enter safely.

Flood prevention measures, particularly to ensure that there is no effect on existing dwellings.

The sewerage must be upgraded to cope with the extra development. The sewerage is insufficient at present, and any new development must include a plan for an upgrade that will guarantee that the sewerage will be able to cope with the scale of the development.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Rachel Philp

Full name: Rachel Philp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To air our concerns

Jessica Pinn

Full name: Jessica Pinn

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

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

This site has been deemed unsuitable for dwellings due to noise from the M5 and flooding in the area, yet the council wants to house traveller families there? Disgraceful, racist and unethical.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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.: Provide plots in a different area of available development land and up to the same standard as anyone else would be expected to live.

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.: Current residents are already struggling with lack of infrastructure, pollution and lack of school spaces. Developers should halt building until all of these issues can be addressed

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.: Change the location of the Gypsy and traveller site to a sound and livable site. Not just shoving them in a noisy corner

4. Do you consider that this part of the Development at the West End 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)

Charles Pinnock

Full name: Charles Pinnock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: EXMO 20, if implemented will vastly increase traffic in the area. This will be exacerbated by the absence of facilities as the residents have to travel to either Exmouth or Budleigh Salterton to access them. Budleigh Salterton being the nearest location for the residents of the proposed development to access facilities would disproportionately suffer increased traffic and congestion. Additional traffic would be forced into Budleigh Salterton using Exmouth Road which lacks the basic provision of a pavement exposing pedestrians to very real danger between Knowle and Clyst Hayes Gardens.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The residents effected by the proposal have in reality had comparatively little time to express objection to the development.

Margaret Pinnuck

Full name: Margaret Pinnuck

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: You state there will be limited development in Tier 4 settlements. How can 4.64 Hectares of land in the village of Feniton be considered as limited. I know it comes into OSM parish but very much impacts the village of Feniton. The entrance to this plot is between 2 railway bridges with very limited visibility. How can building 127 houses be considered modest development. How can this match your Net Zero policy. The majority of these households will drive cars. For the majority of the day we have a 2 hourly rail service. You discuss needing adequate sewage provision. Until our sewage works is upgraded no more houses can be built. A cycle track following the old railway line to Ottery St Mary and Sidmouth could help with sustainable transport. This is not in your plan

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Sustainable transport provision and pressure on SWW to upgrade sewage works needs to be in place before any development is considered

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: as above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: as above

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: as above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Margaret Pinnuck

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.:

6.5

2. Do you consider that this part of the Mitigating Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not legally compliant. Please be as precise as possible. :

Including developments in a village such as Feniton cannot be legal as with limited public transport, 2 hourly trains for most of the day, lanes very much too dangerous to cycle on, this will not assist you getting to Net Zero

2(c). Please set out the modification(s) you consider necessary to make this part of the Mitigating 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 Mitigating 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.: Changes in infrastructure ie returning to hourly trains and developing cycle path must be in place before further development

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.: as above

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.: as above

4. Do you consider that this part of the Mitigating 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 Mitigating Climate Change chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Cooperating would presumably mean listening to the Feniton Parish council representation which evidently has not happened

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Claire Pittard

Full name: Claire Pittard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access to and from Exmo_20 is closer to Budleigh Salterton than Exmouth making Budleigh the obvious choice for services and shopping facilities for future residents of Exmo_20. This would lead to a coalescence of Budleigh and Exmouth contrary to Policy OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access Exmo_20 via another route than the B3179

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

Full name: Claire Pittard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would negatively impact irreplaceable habitats, veteran trees and species rich hedgerows, contrary to paragraph 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20 and create a significant buffer.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

Full name: Claire Pittard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be relocated on an alternative site where it would cause less/no harm to the Pebbled Heaths (SAC/SPA). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in line with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Significantly reduce the size of Exmo_20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

S Platts

Full name: S Platts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmouth already struggles with infrastructure. Drainage and other services, GPs, dentists and the availability of local shops, etc. Until and unless this is rectified to meet current needs the introduction of an additional 1,450 will only make an already poor situation worse.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Improve local infrastructure, including drainage, local shops and amenities, schools, dentists and GPs ahead of any future development.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It doesn't seem to matter how or when objections are raised, still the push for more housing continues, whether it will work for the existing community or not.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

helen playfair

Full name: helen playfair

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This is a site of historical and environmental significance. it would cause significant permanent damage to the surrounding protected countryside as it is immediately next to the boundary. this will bring significant increase in traffic, pollution and noise to this area and the access road and infrastructure cannot support this. there is already significant congestion from increasing traffic along this road which will impact on pinch points including woodbury, darts farm, clyst st mary and sandy park traffic budleigh salterton is the closest town and cannot support this size new development. it will negatively impact st john in the wood historical sites this development would be much better placed on an accessible piece of land closer to the main routes out of devon

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: completely remove Exmo_20 from the local plan as it will devastate the locality

Helen Plumridge

Full name: Helen Plumridge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposal at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebbled Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy,

Exmo_20 would destroy the "tranquility, wilderness and dark skies" of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, and veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulation Assessment (30.1.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to....air quality (East Devon Pebbled Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmou_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmou_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmou_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Emma Ponti

Full name: Emma Ponti

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

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I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Please, please take Exmouth residents opinions into consideration. We need your support.

William John Pope

Full name: William John Pope

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

5.6

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Because implementation is extremely likely to result in damage by flooding to existing properties I believe that implementation would be effectively criminal damage

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Don't build on GH/ED/27 & Otry-10 because to do so would be likely to put buildings and even life at risk

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These areas are unsuitable due to position and slope which would result in a high chance of flood risk

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Exclude GH/ED/27 & Otery-10 from list of proposed development site as they are unsuitable.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Tamara Powderley

Full name: Tamara Powderley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Timothy Pratt

Full name: Timothy Pratt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: With regards to development EXMO_20, the main access appears to be along the B3179. This is at the very top side of Exmouth, meaning that residents would need to double back down into Exmouth via St Johns Road, Marley Road or Hulham Road to reach all services in Exmouth. Indeed the services in Budleigh are actually closer and would likely become the preferred choice for residents. This will likely bring the two towns even closer together which is contrary to Policy OL05 of the local plan.

EXMO_20 is literally across the B3179 where the SSSI Pebblebed heaths start. This would be contrary to the HELAA, the site selection methodology and policy PB01 of the local plan.

EXMO_20 wraps around St John in the Wilderness grade II* listed church which will degrade its rural setting for worship and burials contrary to policy HE02

The land designated for EXMO_20 occupies the highest parts of Exmouth and as stated above borders onto Withycombe Raleigh Common/Woodbury Common. The development of 700+ homes will eliminate the "tranquility, wildness and dark skies" which is contrary to policy OL01

EXMO_20 will break apart habitat and wildlife corridors that exist between the land to the east of the development and the woodland (Big Wood) to the west of St Johns Road, and of course the Common to the north. This is contrary to paragraph 13.9

EXMO_20 conflicts with policy OL09 and policy PB04 as the habitats regulations assessment dated 30th January 2025 states that there is "currently not sufficient certainty to rule out adverse effects in an integrity in relation to..air quality (East Devon Pebblebed Heaths SAC/SPA) such that the plan fails the integrity test. The proposed main site access is opposite that SAC/SPA.

It is understood that the subsoil underneath the majority of EXMO_20 is heavy clay, which will not provide adequate drainage for rainwater. This is likely to cause potential flooding via Withycombe Brook, which has already been identified as under pressure. This conflicts with policy AR01B

As already stated EXMO_20 is remote from the main town of Exmouth, with its main access on the B3179. This can only increase traffic congestion on the routes stated above because there is no public transport to that area of Exmouth. Few residents will make use of sustainable travel such as walking or cycling, not just because of distance to services, but the fact that it's uphill! There are no pavements or cycle paths on the immediate access routes and the B3179 in that area is a fast road. This can already be evidenced by the number of cars that park at the football pitches opposite during matches. Cars can often be seen parking on the visibility splay or even the road. These are all contrary to paragraph 11.2, 11.6 and policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan, reduce it in size, nearer the main town, with access lower down. Revert to EXMO_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Colin Pratt

Full name: Colin Pratt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The access point of Exmo_20 is much closer to Budleigh Salterton than Exmouth, this makes Budleigh the most accessible and convenient town. The services and infrastructure of Budleigh are already overstretched(the Doctors, High Street, School etc) and would be the obvious choice of the residents of Exmo_20. this would undermine the settlement hierarchy and would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan. An alternative site to Exmo_20 for housing allocation should be selected, one which is deemed available, achievable and suitable in the HELAA. Exmo_20 would also cause harm to the adjacent Pebble bed Heaths(SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PD01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would also cause harm to heritage assets. this is in contrary to POLICY HE02. Nearby wildlife sites would be adversely affected and destroy the " tranquillity, wildness and dark skies " of the countryside contrary to POLICY OL01. Exmo_20 development would also be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees, and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to Air quality(East Devon Pebblebed Heaths SAC/SPA) such that the plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. this is in direct conflict with POLICY AR01B. Exmo_20 would also increase the need for vehicle travel and

increase traffic congestion, in conflict with PARAGRAPH 11.2 This isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far(and to steep) from any town centre to use walking or cycling as their choice of transport . this is contrary to OLICYTR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Therefore remove Exmo_20 from the local plan and revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Colin Pratt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Joan Preston

Full name: Joan Preston

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would put pressure on the area's already failing and inadequate infrastructure. It would increase the need for travel by car and add to the already congested roads in conflict with PARAGRAPH 11.2. It is isolated and unsustainable development. Residents would need to travel in excess of 800m to access key services and facilities, contrary to PARAGRAPH 11.6. Walking/cycling are not feasible options due to both distance and terrain from any town centre. This is contrary to POLICY OL05 of the local plan.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay thus making soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

St John in the Wilderness Grade II listed church and churchyard sits in an oasis of tranquillity for worship which currently exists for the congregation. Exmo_20 would have immense negative impact on this. This is contrary to POLICY HE 02.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mike Prudence

Full name: Mike Prudence

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Alexander Pryor

Full name: Alexander Pryor

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am not a lawyer so cannot be sure if the section is legally compliant or not, but this 'consultation' process seems designed to make it impossible for the general public to comment, and I believe that in itself is not legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The access roads and Green Lane itself are manifestly not suited to lots of industrial traffic. There are no foot paths on Green Lane meaning pedestrians have to dodge cars. I live opposite the proposed entry to the industrial site and walk my children to school down this road - it is single car-width in several places which already means cars/vans driving close to pedestrians. Also frequent instances where cars have to reverse to allow an on-coming vehicle to pass. It would be moronically stupid to deliberately bring lots of industrial traffic into this area.

The flood relief scheme currently being built will by design flood the main access road into the village (including access to the proposed industrial site) on a quite frequent basis making the site difficult to access. The alternative routes involve driving along narrow single-track roads and through Old Feniton (a small hamlet also manifestly unsuited to heavy through-traffic).

Regarding extra housing in the village, the Burlands Mead site has recently received planning permission that will already add many more homes to the village. Despite huge numbers of public comments, these plans have not provided sufficient car parking spaces within the new development; have not addressed flooding problems; have not addressed sewage problems; have not considered outcomes of the recent Feniton housing needs survey; have not considered employment or transport links or school places or availability of health care. The village and local road network is already at capacity. Any further proposed development like the proposed Feni_08 site should not be allowed to proceed until these same issues have been looked at and resolved - widening access roads, improving transport links, improving sewage so we don't get such frequent over-spills, reducing flooding risks.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Ottery_20 from the proposal as this is manifestly unfit; and reduce the size of Feni-08 to a smaller area to reduce the impact on the village, and to reduce the extra flooding risk that further development will pose (to the existing village + the new development itself)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jamie Purdue

Full name: Jamie Purdue

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

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: As per the NPPF Annex 3, Caravans, mobile homes and park homes are classed as 'Highly Vulnerable' in terms of flood risk vulnerability meaning they cannot be sited within Flood Zones 3a & 3b as per Table 2: Flood risk vulnerability and flood zone 'incompatibility'. It is EDDC's duty to site these vulnerabl properties in Flood Zone 1 as part of the sequential test.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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.: Site any Gypsy & traveller site within Flood Zone 1, with safe access/egress at all times. Flood Zone sites should only be considered once the Sequential test confirms no other available site within the West End. The risk to loss of life due to flooding is high at this site.

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.: 'What belongs opposite a Scout hut, between a shooting range and church, within earshot of the M5, inside a Flood Zone, and adjacent to a sewage overflow that has already spilled in 2025?'

This should be a start of a joke, not EDDC's response to a lack of Gypsy & traveller sites in the West End. Clearly not sound.

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.: Site any Gypsy & traveller site within Flood Zone 1, with safe access/egress at all times.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Site any Gypsy & traveller site within Flood Zone 1, with safe access/egress at all times. Flood Zone sites should only be considered once the Sequential test confirms no other available site within the West End. The risk to loss of life due to flooding is high at this site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

MRS ELIZABETH PYE

Full name: MRS ELIZABETH PYE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_08 & Exmo_16 goes against policy OL04 which states that the “ visual integrity , identity and scenic quality should be preserved”. This development would impact on the Maer valley which previously has been identified as an important green space corridor.

In Chapter 13 – Biodiversity states the biodiversity or wildlife value is greater than before the site was developed. Exmo_08 & 16 would go against this policy as development would reduce biodiversity. The land in question frequently has wildlife species including deer, foxes, and a wide diversity of birdlife.

Exmo_08 & Exmo_16 goes against Policy OL10 which aims to “conserve and protect the highest grade of agricultural land” as it would develop on a site of high quality agricultural land. In the Chapter - Our Outstanding Landscape the policy is very clear that the loss of high quality land should be resisted.

In respect of Exmo_08 and Exmo_16 (combined) it is stated that the preferred access would be off Parlour Meadow with a less preferred option of Elm Lane. Currently there is often severe traffic congestion on and around the main access road leading into Engineers Way / Parlour Meadow development. This access road (Pankhurst Close) provides access to numerous businesses including a scrap metal merchant, builders merchant, car repair workshop, printers, scaffolding company and joinery workshop along with a number of other businesses.

It is our opinion that providing access to another circa 45 dwellings would further increase the chaos that ensues at peak times of the day. This access would need to cope with not only the increase in cars for the houses but also the service vehicular access, delivery and lorries requiring access to the site.

As a result we recommend that other access options should be explored such as improvements to Elm Lane to enable the lane to be considered as a viable option.

Exmo_08 & Exmo_16 would go against the Policy TR01: Prioritising walking, wheeling, cycling and public transport. Due to the topography of the local area, residents are more likely to use their cars to access the local shops. The nearest convenience store is at Littleham Cross and this is already an area where there is minimal parking with cars frequently parked on double yellow lines at / near the junction.

There is a potential of increased flood risk with development of Exmo_08 & 16 due to increased run off from the site, which will impact on Littleham brook, going against Policy AR01.

The text has been extracted accurately, with highlights and formatting preserved where applicable. Let me know if you need further assistance!

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MRS ELIZABETH PYE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heath (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MRS ELIZABETH PYE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmouth_20 is significantly closer to Budleigh Salterton than Exmouth, making Bidleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors surgery, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MRS ELIZABETH PYE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmouth_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors surgery, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MRS ELIZABETH PYE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development at Exmo_20 should be located at a different site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats, veteran trees and species rich hedgerows across the site, contrary to paragraph 13.9

The habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to - air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICYOL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St Johns in the Wildeness Grade II listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to Policy HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe brook, on a subsoil of heavy clay which makes soakaways ineffective. It

would exacerbate the identified flood risk through the lower lying land at the bottom of Withycombe. This is in conflict of Policy AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with Paragraph 11.2. It is an unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6. It is too far & too steep from either town centre for people to use walking or cycling as transport choice. This is contrary to Policy TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh e.g the High Street, Doctors surgery, school, beach would be the obvious choice for residents of Exmo_20. This would be contrary to Policy OL05 of the local plan due to it leading to coalescence of Budleigh and Exmouth.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 or reduce size considerably.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)