

Filtered Data Export

Full name: Peter Williams

Organisation (where relevant): Otter Valley Association and Otter River Catchment Action

Proposal:

7. Adapting to Climate Change

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR02

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

1(c). If the comment is related to a site, please state the site reference here.: All Honiton, Ottery, Feniton related development sites

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(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.: My name is *** Personal details have been removed ***, and I am a trustee of the Otter Valley Association, a civic society with over 2,000 members and supporters, as well as leader of the Otter River Catchment Action (ORCA) group. As you know, the objective of the Water Cycle Study is to inform the East Devon Local Plan, ensuring it supports sustainable growth and identifying constraints that may limit planned housing growth. We believe that, having commissioned this independent report, the policy AR02 does not currently take into full account the findings of the Water Cycle Study. In particular, we feel that AR02 should include the specific findings that no additional housing load should be applied to the key Honiton, Feniton, and Fluxton catchments, without first addressing the clear deficits in treatment capacity. Background: • In 2024, Honiton sewage works discharged untreated sewage directly into the River Otter for nearly 5,000 hours. • In this Study, we find that Honiton has the second highest number of wastewater vulnerability indicators and is already exceeding its treatment capacity by 40% - and that's just in dry-weather. • The Otter also has the biggest phosphate problem in the region, with 70% coming from sewage works. Honiton

is the source of half of that phosphate, and has been in breach of its permit condition on phosphate for three of the last six months. • The Otter is officially designated a 'Sensitive Area' for Phosphate, and the visible environmental impacts of high phosphate levels include dense blanket weed and algae growth, smothering the riverbed. • It's worth noting that three of the study's four RED-status sewage works discharge directly into the River Otter. • Honiton is projected to see the largest proportional increase in housing in the region, with 838 new homes, with significant growth also planned for Fluxton and Feniton. • To accommodate the planned development, Honiton will require a 73% increase in treatment capacity (the greatest deficit in the region); and Fluxton and Feniton will require 25% and 20% respectively. • The study therefore concludes: No additional housing load should be applied to the key Honiton, Feniton, and Fluxton catchments, without first addressing the clear deficits in treatment capacity and phosphate removal. There is however a silver lining to this report. It appears that SWW could remedy several critical issues, and enable much needed home building, by bringing forward the scheduled update of Honiton works to a 2030 completion. A relatively low, and overdue investment by SWW, providing the required treatment capacity and Phosphate removal, could unlock significant investment and pressure on local housing. We therefore ask the council to require SWW to bring forward these plans before considering any further development in the Otter catchment.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: See description above.