

Filtered Data Export

Full name: Lisa Bowman

Organisation (where relevant): Exmouth Town Council

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

1(b). Does your comment relate to one of the changes listed in the table above?: No

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.: Section 19 and Section 20 of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) sets out the legal requirements a local planning authority must follow when preparing development plan documents (including Local Plans). Government guidance states that Local Plans must identify strategic priorities and be built on proportionate evidence. The Council has provided no evidence of changed circumstances that would justify overriding Policy EN1 of the Exmouth Neighbourhood Plan. There is no strategic purpose for moving the settlement boundary—no site allocations depend on it. There is no environmental, heritage or infrastructure evidence published to justify touching a designated "sensitive heritage area". This means the plan fails s.19 because the boundary change has no evidential basis and was not prepared lawfully or transparently.

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.: Please remove the proposed boundary change at Bystock Village and retain the existing settlement boundary as defined in Exmouth Neighbourhood Plan.

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

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)

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

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Full name: Lisa Bowman

Organisation (where relevant): Exmouth Town Council

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

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.:

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3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

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

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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.: We welcome the opportunity to comment on the Regulation 19 draft of the East Devon Local Plan and, in particular, to respond on Policy AR02 (Water Quality) in light of the recently published Water Cycle Study (WCS). We support Policy AR02's aim to safeguard water quality across East Devon but remain concerned that the emerging Local Plan does not yet secure the wastewater and water-supply infrastructure needed to ensure compliance as growth proceeds. The Water Cycle Study (Nov 2025) identifies capacity pressures at multiple Waste Water Treatment Works (including Maer Lane, Feniton, Otterton, Honiton and others), recommending phasing to align new occupations with confirmed upgrades. Key Concerns and Evidence: • WCS identifies multiple Waste Water Treatment Works (WwTWs) nearing or exceeding capacity, risking breaches of AR02 objectives. • Lack of clear phasing and enforceable triggers for infrastructure upgrades before occupation. • Inconsistencies and gaps in evidential spill data and capacity metrics undermine transparency and compliance.

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.: In practice, this policy requires stronger policy mechanisms aligned to: (1) hard phasing of Grampian-style conditions so homes cannot be occupied until upgrades are delivered and commissioned; (2) common, transparent and up to date capacity metrics and audited spill data (CSO frequency/duration, DWF headroom) to demonstrate AR02 compliance; (3) catchment-based assessments and mitigation (surface water separation, nature-based solutions, enhanced water efficiency) for constrained areas; and (4) robust monitoring and contingency, including an annual Water Infrastructure Delivery & Monitoring Statement and pausing occupation if headroom falls short. These measures will translate the WCS evidence into enforceable delivery, prevent deterioration in receiving waters (rivers, estuaries, coast), and provide confidence to residents that development will not proceed ahead of adequate water and sewage infrastructure. Requested Changes and Additions: • Introduce hard phasing triggers (as Grampian-style conditions) to prevent occupation until upgrades are complete. • Require common metrics and transparent data on capacity and sewage spills. • Embed catchment-based assessments and mitigation measures for at-risk WwTWs. • Strengthen linkage between the Local Plan, IDP, and SWW investment timelines. • Establish annual Water Infrastructure Delivery & Monitoring Statement for compliance tracking. We support the ambition of Policy AR02 but to make it sound, the Plan should translate the WCS findings into clear, enforceable delivery triggers, transparent data requirements, and robust monitoring. We would welcome ongoing engagement with EDDC, the Environment Agency and SWW to refine these mechanisms and ensure the Plan is sound with respect to water quality.

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)