

To whom it may concern,

I strongly object to the number of houses proposed in Ottery St Mary.

I have some general points/objections to the proposed new plan at the beginning, moving on to objections related to the proposals at Ottery St Mary.

Finally, I have some more specific objections to would like to the proposed site in Ottery (LP_Otry_09).

1) Why is EDDC rushing through a new plan? In Chapter 1 Introduction, evidence and policies 1.4 states "the intent is that the East Devon Local Plan will cover the period from 1 April 2020 to the 31 March 2040. Government policy is that plans need to have an end date of at least 15 years from the date of plan of adoption".

The current East Devon Local Plan has run from 2013. It was due to run until 2031. However, if this new plan goes ahead then the current Local Plan will have run from 2013-2020, a total of 7 years.

Surely this goes against said Government policy for the duration of Local Plans, it has ran for less than half the timescale that Government policy dictates, yet East Devon District Council feel they are able to go against this policy. Are they setting a precedence with this? Will they ignore this guidance multiple times?

2) We recently had a Census in 2021. My understanding of the compulsory census is to enable the Government to plan services and needs, such as housing needs, based on factual requirements.

The Government's Office of National Statistics states that "The census is important to local authorities across England and Wales. It is also vital to the government and many other public sector organisations. This is because it gives them the information they need to develop policies..."

Why has EDDC rushed through this new plan? Why haven't they waited a short while longer so they could analyse the data from the census and make a plan for our area based on actual up to date data/statistics/facts of what our area needs, rather than what I assume can only be a combination of guesswork and out of date statistics and data. You state on page 20 that you have used the latest statistics from ONS. However, as stated, to get accurate and up to date statistics you needed to have waited until the release of the 2021 census data.

3) On page 10 of the proposed local plan you state there are 146,300 people in East Devon when this is out by thousands, with the 2021 census showing there are 150,800 people living in this area. An increase of 13.8% from 2011, over double the increase nationally (6.6% population increase in England).

Why is East Devon District Council merely accepting pressures put on them for more housing? Why aren't our councillors stating these facts - our area has grown in population more than double the rest of the country and it is not possible to keep growing at this rate. Stand up for the residents you have, don't be pressurised by central government to overbuild our beautiful area.

4) Why is this new plan still being pushed ahead despite central Government having scrapped plans to impose mandatory housebuilding targets on local councils? Surely this makes the need for a new plan obsolete & we can continue with the current plan for the duration of its time? Or, at the very least, revise the extortionate amount of new houses suggested for this area?

5) You state on page 11 that the vision of the plan is 'A greener East Devon' - how can you meet this goal by building this amount of houses and associated roads etc, taking away the green spaces?

6) On page 12, Objective 9 = "To prioritise walking, cycling and public transport..." How do we know you will meet your objectives? 10 years ago, when the existing local plan was introduced, on page 80, point J you stated you would "encourage initiatives aimed at promoting a cycle link along the course of the old railway linking Ottery St Mary to Tipton St John". As far as I am aware, in 10 years, absolutely no progress has been made.

Perhaps EDDC should channel funds into actually making their promises & priorities happen, rather than spend a fortune rewriting the Local Plan years before the current one runs out, wasting the taxpayers money, instead of using it to fund productive projects that would increase quality of life and green transport routes.

7) On page 13, you state the Spatial Strategy is to "Promote significant development at the Principle Centre of Exmouth and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton and Sidmouth to serve their own needs and that of the wider surrounding areas." My understanding is that due to the amount of development that has occurred in Ottery in recent years that there was an agreed limit of 300 new homes in Ottery between 2015 - 2031. In that time, EDDC has actually given the go ahead for far more than was agreed in Ottery St Mary and we have had almost double that number built. In this new proposed plan you suggest a further 288 new homes in Ottery. Will that number also be doubled? How can we possibly trust EDDC in its promises, when it hasn't stuck to previous agreements?

Is EDDC just trying to rewrite the Local Plan early as a way to shoehorn more houses into East Devon? Did it perhaps meet all its housing requirements set out in the 2013 - 2031 plan and started to worry that they wouldn't receive any income from builders, therefore, felt it needed to write a new plan? You state on page 19 that "We see it as key that the local plan quantifies the actual overall levels of house building that will be provided in East Devon through local policy".

How can we be expected to believe that when the same should have been applied to the previous Local Plan, yet EDDC has allowed DOUBLE the amount of houses set out in the plan for Ottery and now wants to not only allow but actually stipulates even more.

8) On page 15 you state that "Despite being a Main Centre, Cranbrook is not addressed in this local plan as things stand as a Cranbrook specific plan was adopted in autumn 2022....". Ottery St Mary has its own neighbourhood plan. Why is Cranbrook being singled out as not included because it has its own plan, yet Ottery, which also has its own plan, is being included?

If this is an 'East Devon' local plan then it should include the whole of East Devon. If one area is not included due to its own plan, then every area with an agreed own plan should also not be included. I understood that one of the purposes for building Cranbrook in the first place was to take the pressure off building houses in other areas. This just does not seem to have happened.

9) Page 42: 4.5 "The Council have invited landowners, who may wish to see their land developed, to submit site details to us through an exercise called the Strategic Housing Land Availability Assessment." This seems to me a crazy way to develop the local plan. Developing the countryside in this way is not looking at where is best for a town or village to develop, where are the brownfield sites and the waste land, where is the most environmentally friendly place to develop, where it may improve a town to develop in a certain place. Instead, you are looking at who would like the money most.

10) You talk of a second new town in East Devon. Surely, before even considering another new town, you need to rectify the problems with the first new town i.e. Cranbrook. You talk in this proposed plan about "designing beautiful and healthy spaces and buildings" on page 12, however, Cranbrook is just one giant, sprawling housing estate.

They do not have their promised supermarket, shopping centre, leisure centre, library etc. There were multiple problems with the building of the houses and the quality of the houses. There are ongoing problems with their energy provider. How can you even think of a second town until you have solved some of the problems with the first new town?

11) Ottery St Mary: Where have you got your 'facts' from?? You state on page 77 that Ottery St Mary has "good transport links to Exeter.....it doesn't have a train station....it does have good bus links and access to the strategic road network".

Reality: the bus service to Ottery was reduced in the summer of 2022 with the last bus from Exeter to Ottery leaving Exeter at 18:40 (previously the last bus to Ottery was 21:10) - do you deem this a good service?? In regards to the road network: yes, Ottery has access to the A30. However, any incident on one of the main roads into or out of Ottery causes absolute chaos in the town and surrounding lanes as Ottery only has one main route through the town. The centre of the town and the surrounding roads are narrow country roads, not suitable for masses of vehicles. Has this been taken into account??

12) In the existing neighbourhood plan, you have looked in detail at each town, what it has now and what the vision for the future of the town is. This new plan totally ignores this aspect, appearing to focus solely on allocating housing to each town.

It does not address the fact that the bus service to Ottery has reduced, the Children's Centre and all accompanying groups for new parents and their babies/toddlers that used to be provided by the Children's Centre, has left the town, the hospital is no longer operating as a Community Hospital, and many of the services operating out of it (e.g. Health Visitors) no longer are, so Ottery residents have to travel to Exeter for an inpatient stay/Honiton for the health visitors etc - this is not a 20 min neighbourhood.

The local health centre serves a huge population and is currently struggling with the number of patients it serves - there is often a long wait for appointments here, acknowledged by the Health Centre themselves in their Summer 2022 newsletter "As many of our patients would have undoubtedly seen in the press recently, Primary Care is under more pressure and dealing with a higher demand than ever before and we are so sorry to hear of the difficulty many of our patients have been experiencing in gaining access to Coleridge Medical Centre. Nationally, the whole NHS is experiencing more demand for care than we have ever seen and here, locally, it's no different. We are managing to keep up with urgent and essential demand but we are challenged by long waiting lists for other services and similar workforce issues;".

When DCC put in a planning application to rebuild Tipton St John primary school in Ottery, one of the reasons they cited for wanting to build it in Ottery was that the existing Ottery Primary School is oversubscribed. If this is the case, how can you consider more housing in Ottery when there are not the educational facilities available for the children who will move into these houses.

Again, this does not fit into your "20 minute neighbourhood" if they are needing to be transported to schools in other areas. And which schools would these be? West Hill Primary is also at capacity.

Finally, with the increased financial pressure on Devon County Council due to the current cost of living crisis, how do we know that other facilities in town will continue to be funded at the same level as they currently are? Are we going to continue to gain houses and lose our infrastructure?

In relation to the proposed development in Ottery St Mary (LP_Otry_09), this land has previously been allocated for educational and community use, not housing. I think it would be extremely short sighted to allow housing to be built here. If you allocate this land for housing it will not allow future expansion of the current secondary school (Kings School). Whilst Kings School may currently have capacity for pupils in its catchment area, if East Devon District Council wish to continue allocating large amounts of housing to Ottery St Mary & the surrounding villages then you must safeguard this land for the original purpose of education, otherwise, the current school will not be able to expand and when it reaches maximum capacity through all these new housing estates, you will then need to find the space to build a brand new school.

However, if you continue to safeguard this land for education, then there will be the physical space for the school to expand, as and when is needed. Also, if you continue to allow new houses in Ottery, perhaps we could finally get the swimming pool that a lot of residents have asked for over the years. Again, it would make sense to 'reserve' land next to the existing school an sports centre for this,

On page 10 of the proposed Local Plan, you state that 'flooding - from rivers, the sea and surface water - is likely to get worse. Yet, you propose a site LP_Otry_09, part of which are identified by the Environment Agency as being at high risk of flood, as appropriate for housing.

Also, in relation to this proposed development land at LP_Otry_09 just 2 years ago a major planning application for a school and housing on this land was REFUSED by yourselves at East Devon District Council on the following grounds: "The proposed development is located in the countryside outside of any Built-Up Area Boundary with no planning policy support for residential development in this location. The resulting harm from the development to the visual amenity of the wider area at both close and distant views, including the visual impact from the proposed new roundabout onto Exeter Road, and the lack of provision of 50% affordable housing outweigh the benefits from the proposal.

"As such, the proposal is contrary to Strategies 7 (Development in the Countryside), Strategy 24 (Development at Ottery St Mary), Strategy 34 (District Wide Affordable Housing Provision), Strategy 46 (Landscape Conservation and Enhancement and AONBs) and Policy D1 (Design and Local Distinctiveness) of the East Devon Local Plan 2013-2031 and Policies NP1 (Development in the Countryside) and NP25 (Land Identified for Education uses in Ottery St Mary) of the Made Ottery St Mary and West Hill Neighbourhood Plan."

All those factors remain - nothing has changed. Therefore, I cannot comprehend how EDDC now thinks this is a suitable site for housing. I have attached the email I sent to EDDC at the time of the planning proposal for Tipton School & housing development on site LP_Otry_09 as all my objections then still stand now:

To East Devon District Planning Dept. I am writing to you to strongly OBJECT to the plan for 150 new houses and a 210 space primary school on Exeter Road, Ottery St Mary. Ref: 20/1504/MOUT

There are multiple reasons why I am objecting to this proposed development. I have outlined my objections below, with references to the sources I have used attached as well.

1) The Neighbourhood Plan for the Parishes of Ottery St Mary and West Hill 2017 - 2031 and the East Devon Local Plan 2013 - 2031 both state that Ottery St Mary has had a large amount of development in recent years and is not identified as needing any more for the period of these plans. Therefore, to build a large estate of 150 houses would be in direct conflict of both of these plans. This reason alone should stop this proposal from going ahead. If you allow this housing estate to be built it will be completely disregarding these plans and will set a precedent across the whole of East Devon. Please see appendix 1.

2) The Neighbourhood Plan for the Parishes of Ottery St Mary and West Hill 2017 - 2031 and the East Devon Local Plan 2013 - 2031 both explicitly state that the land where the development of houses is proposed is Safeguarded for Community & Educational uses. Therefore, to build 150 new houses on this land would be in direct conflict with these plans. An overwhelming majority of Ottery residents voted in the Neighbourhood Plan - 91.6% or 1305 residents – and therefore they voted to safeguard this land. If permission is granted to allow houses on land safeguarded for education, it will be an absolute mockery of our so-called democratic society. Please see appendix 2.

3) Ottery St Mary has had a large amount of development in recent years placing a large strain on the town's infrastructure - the census data from 2001 - 2011 shows that Ottery St Mary was in the top 30% of towns for population increase in this time scale, and there has been substantial further development since 2011.

Not all the new developments have been completed yet so the full impact of all the recent sizable developments on the town has not yet been felt. In addition to this, Ottery Town Council continue to struggle to gain access to the S106/CIL money from the developments that the town have already had, so projects that the Town Council wish to implement to improve the infrastructure in our town have had to go on hold.

DCC state in their planning statement "Economic benefits at the operational stage including Community Infrastructure Levy payments, New Homes Bonus, Council Tax receipts and increased expenditure in the local area; "

These benefits have not yet been seen from the new developments we have already had in town, so it is hard to believe the town would benefit from yet another housing development. Not only have the new housing developments placed a greater strain on the infrastructure, we have also lost a lot of our infrastructure, not seeming to be prioritised as a town with the local authorities! Ottery St Mary Hospital has closed to inpatients.

The Children's centre initially closed but still ran some groups in the town, then it completely stopped its support groups in Ottery (Breastfeeding groups, Stay & Play groups, baby weigh-in group, bumps and babes group, education sessions etc).

There is a lack of groups within the town for babies and pre-schoolers. Ottery St Mary appears to get 'overlooked' when the East Devon Rangers are organising children and family activities and when Switch East Devon are organising Community Fun Days.

The Beaver groups in Ottery are completely full and run a long waiting list. The car park at Sainsbury's and the free, time-limited on road parking in the centre of Ottery St Mary is frequently completely full. The GP service is stretched and people often have to wait a very long time to get an appointment.

The other health services in the area are very stretched e.g. the Health visitors are not carrying out 2 year checks at the appropriate time due to workload pressures. There is a waiting list for town allotments. The banks in Ottery have all closed (apart from a mobile bank which visits the town for a limited time each week). The post office/sorting office has closed & we now just have counter service within a shop. Please see appendix 3.

4) Several government documents relate the need to match the growth of residential areas to growth in the local economy and employment. I have not seen evidence of this with the recent large housing developments in Ottery St Mary. How will the town be able to support another large Housing Development without a match in growth of economy/employment? Especially, when you consider our current national crisis. Recently in March this year 2400 jobs were lost when the airline Flybe went into administration.

Many of these were local jobs as the Flybe headquarters were at Exeter Airport. This has had a knock-on effect with jobs now being at risk at Exeter airport. One of the other major local employers - Otter Nurseries - is also making a large number of redundancies due to the effects of Coronavirus. (According to the Neighbourhood Plan '8.5 The largest employer in the Neighbourhood Plan Area is Otter Nurseries just to the north of Ottery St Mary Town.')

Also, due to Coronavirus a lot of businesses are struggling to stay afloat so where is the employment going to be for the people living in all these new houses? DCC state in their planning statement "Economic benefits at the construction stage including construction jobs and spend in the town centre and local area;" The building contractors is a short-term employment. How many local builders and tradespeople will be employed?

This is one of the trades least affected by Coronavirus as they could continue to build during Lockdown. Also, this so-called economic benefit will definitely not be felt by the farmer who currently farms the land. What about substantial long-term jobs for the existing residents, let alone, proposed new residents? Please see appendix 4.

5) Flood Risk. I have two concerns about this.

5A) My first is a question as to whether the flood risk at Tipton St John Primary is as great as Devon County Council portray it to be. I requested to see the documents from the Environment Agency at the public consultation and they could only show me the original 'report' which was published in 2014.

I felt this report was very unprofessional as it wasn't even presented on headed paper, one photo used in the report did not indicate what date it was taken (& only showed flooding outside the building, not whether the inside had been flooded?) and the other had the date scrawled in pen across it. As I understand it, flood prevention works have been completed since this report was written and I was unable to find out whether or not the school has been flooded since these works were carried out?

I felt it was unprofessional and incompetent to base a consultation for a multi-million pound development on an unprofessional and out-dated report. The new 'report' from the Environment Agency seems to have been e-mailed after the start of the Consultation so I can only assume the entire consultation was based on an outdated report.

Further, the report states that there is "life threatening flood risk to all users of both sites" yet, even with this 'life threatening risk', the school has still been operational for 6 years (!) after this report, apparently putting children's lives in danger every day. How seriously have Devon County Council taken this report considering this?

Furthermore, the Environment Agency contradict themselves as their website puts the lower half of Tipton St John Primary School in Flood Zone 1 (less than 0.1% chance of flooding in any year,) & the upper half of the school in Flood Zone 3. Going by the Environment Agencies own website it would not appear that the risk is as high as they have portrayed. Also, earlier this year, the Environment Agency & DCC identified areas which they are most concerned about flooding. Tipton St John did not feature on this list.

5B) My other concern is of the flood risk that the new development will present to Ottery St Mary. As I understand it, despite the heavy rain over the winter of 2020 Tipton St John School did not flood. However, Thorne Farm stream that comes down from Cadhay bog did flood Cadhay Lane last winter. I am extremely concerned over the capacity of this stream to take the surface water run-off of 150 houses and a large school when it is not coping with current rain water. Especially when climate change is considered and the Environment Agency is predicting higher rainfall over the coming years. Please see appendix 5 where I have put in the copies of the EA reports and photographs I took of Cadhay Lane during winter 2020 (this section of the lane is immediately adjacent to where the access road of the estate will be).

Also, I understand that the Environment Agency carried out Flood prevention work in Ottery to reduce the risk of flooding on the Thorne Farm Way estate and the Environment Agency have been quoted on <http://straitgateactiongroup.blogspot.com/> as saying the following: "the (flood relief) scheme for Thorne Farm does not take account of any increased surface water flows that may occur as a result of quarrying upstream of that site".

Presumably this also includes that it has not taken account of any increased surface flow areas due to other factors such as a large new housing development upstream of that site. Therefore, the existing flood defence scheme to protect houses in the Thorne Farm Road area may not be adequate with this new development being proposed directly upstream of it.

In addition to the above points the East Devon Local Plan specifically states in relation to Ottery that “(h) Promoting measures to reduce potential future flooding and avoid development on the extensive flood zones to the West and North of the town”

Is this proposed development a measure to reduce potential future flooding? My concern is that it will increase it, especially seeing the recent flooding on Barrack road in 2020 which has occurred since the Kings Reach development. The National Planning Policy Framework states “ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.”

I see that DCC has had a flood risk assessment carried out by ‘Harrison Barron Smith’. I find it strange that they have not used the Environment Agency (EA) to carry out this, when the EA has been involved with the current Tipton School site.

I note the company that carried out the Flood Risk Assessment of the site has based their assessment on the Environment Agency’s flood risk zone mapping website. The same website which puts half of the current Tipton St John Primary School in flood zone 1 (less than 0.1% chance of flooding in any year), so I would question the accuracy of either the EA website (& therefore Harrison Barron Smith’s whole ‘flood risk report’) or DCC’s argument that Tipton School needs to be relocated.

I also note that their ‘Flood Assessment’ appears to look at the site in isolation, and not take note of the town’s history of flooding or of the potential flood risk that this site will cause to properties downstream of it. Their report makes absolutely no mention of the previous flooding problems that Ottery St Mary has had (& continues to have) as a town, and previous work carried out by the EA to try to prevent flooding of the Thorne Farm Way Estate, this estate being directly downstream of the proposed development and has the Thorne Farm Stream running through it.

6) Highway concerns:

6A) Cadhay Lane: At the Consultation stage DCC proposed to make Cadhay Lane access only and put in traffic calming measures along Cadhay Lane. I asked who would police the ‘access only’ lane and was very dubious that people would adhere to it, in fact I pointed out that I felt the lane would get substantially busier due to the proposed new houses. I also pointed out that there are already traffic calming measures in place along Cadhay Lane (speed bumps, a chicane outside the Kings School) and that it appeared that the person representing DCC had not even visited Cadhay Lane. DCC’s response to this in the planning application is to leave Cadhay Lane as it is which is not an adequate measure and was not listening to our concerns!!

The children of Kings School regularly cross Cadhay Lane to access their PE facilities, so an increase of traffic on Cadhay Lane (due to people in the lower part of the proposed development using that way as the quickest to get into Ottery) is going to put the Kings School children at a greater risk of RTC. The 'Transport Assessment' DCC has included in their application has said DCC is in discussion with Kings School re: traffic calming measures.

Surely a proposal for the safety of The Kings School children is of paramount importance and needs to be in place before a planning application is submitted? Furthermore, it was unclear on the plans as to what they intend to do where the 'new road' from the estate meets Cadhay Lane.

Currently, the position of where the new road meets Cadhay Lane (a single track lane, used heavily by agricultural vehicles) is immediately adjacent to a blind corner on the lane, at a point where the National Speed limit is applied. This cannot be considered safe.

I felt it was unclear on the plans but are they planning to 're-align' Cadhay Lane on the blind corner? If they do this, will they be 'taking' some of Thornebrookes property in order to do this? Will they have to 'bridge' some of the Thorne Farm stream to do this? Will they be destroying hedgerows to do this? Will they be destroying a big, old tree on the corner to do this? Or, will they leave the lane as it is, with a new road from the estate leading onto a blind corner on a single track lane which is regularly used by large agricultural vehicles? Having a new estate with access onto Cadhay Lane immediately before a blind corner feels very dangerous.

DCC Planning statement states "The proposed access road will take some traffic away from the southern section of Cadhay Lane, which bisects the King's School site, reducing the potential for conflicts between pedestrians crossing the road and vehicles."

I do not understand this. I do not understand why they think people will travel up through an estate, past a primary school (where no doubt there will be traffic calming measures) and bypass Cadhay Lane which will be a shorter, quicker route....???? This statement from DCC is wholly inaccurate.

6B) Exeter Road: I am concerned about how one of the main routes out of Ottery to the West towards Exeter (Exeter Road) will cope with any more increase in traffic. This road seems to be struggling with the additional vehicles which have been using it since the rapid expansion of Ottery St Mary.

An example of this is the amount of vehicles which have gone into the ditches at the side of Barrack road. 2019 has seen an unprecedented amount of disruption to the road due to vehicles in ditches along it – at least 5, including 1 lorry.

I see that an assessment of the volume of traffic has been completed on Exeter/Barrack road but not of the speed at which cars travel. As you enter the residential section of this road going towards Ottery the speed reduces to 30mph.

However, vehicles are frequently observed at travelling faster than the 30mph speed limit, overtaking near to junctions on this road etc. The residents on Barrack Road have been campaigning for improved road safety on this stretch of road for years. I do not feel that moving the speed limit boundary will improve the dangerous drivers who currently exhibit these behaviours and I feel that to get a 'true' picture of the traffic conditions of this road a speed survey in the 30mph zone should be conducted.

Please see appendix 6 where numerous concerns of local Ottery people have been voiced on a local Facebook page 'Ottery Matters'. My opinion is that there will be a 'higher risk to children's lives' from accessing a primary school off this busy road than the current 'flood risks' at the school in its current location. What are the government statistics in England for death/injury to a child via flooding v's death/injury to a child from a RTC?

6C) River Access: The walk between Ottery St Mary and Tipton St John along the river is very popular. This is a walk I do regularly. However, currently, Barrack Road feels very dangerous to cross to access the river. The points to cross the road to access this river walk are both very close to blind corners on the road. I worry that the safety of my family and others when crossing this road will be compromised even more with the additional traffic on the road from this proposed development.

6D) Practicalities of the proposed school: The planning proposal states: "In terms of the primary school, a dedicated car park will be provided for staff, school minibuses and visitors. as well as the car park there will be a drop-off bay outside of the school, along with additional spaces to the immediate east of the school site which can be used by parents visiting the school or dropping-off/picking-up."

First of all, this is a primary school. Only a small number of the oldest children at the school will be able to take advantage of the 'drop-off' bay. The majority of primary school children need to be taken to their classroom by their parent/carer due to the age of the child. Secondly, given that the size of the school proposed is 210 spaces, and that a number will be travelling from Tipton St John and beyond, is 10 spaces (as shown on the plan) adequate for parent drop-off/pick up? The numbers DCC gave of Tipton Children at Tipton School are 21 plus there are 9 from West Hill. That makes at least 30 children travelling by car. However, there are 95 current pupils at Tipton School.

If you subtract the ones from Tipton & West Hill, and assume that the 38 from Ottery won't commute by car, there are another 27 children who attend the school, who are presumably from outlying villages and hamlets. This means that there are at least 57 children travelling from Tipton, West Hill and other villages to attend this school (the vast majority of the current students, in fact). 10 parking spaces is not adequate when you have this many families who will need to drive to the school.

There will be a substantial amount of traffic/car parking on that estate in the morning making it hazardous for very young children getting to school. The location of the proposed new school on the very outskirts of town, up a large hill will make it unfeasible for a large proportion of the Ottery children who attend to go by foot/bike, especially considering the young age of these children.

There are substantial problems around Ottery St Mary primary school drop-off/pick up times due to the number of parents driving on the 'school run'. There is even an action group formed as parents are afraid for the pavement and road safety of their children around the school at this time. I do not feel that adequate provision has been made for a safe drop-off/pick up of the proposed new schools children.

I also heard at the consultation stage that although this proposed school will initially cater for 210 pupils, they will build it in a way to enable rapid expansion to a 420 place school. Is this still the case? If so, have they really considered parking for staff and parents for a school this size to minimise future problems and have they really considered child safety when going to/from school?

DCC stated in their planning statement "Reduction in traffic movements created by the travel to school of more children from Ottery St Mary to the current site of the Tipton St John primary school than will travel from Tipton St John to the proposed site. There will also, over time, be a reduction in the number of children travelling away from Ottery St Mary to other local primary schools; ". Have they really considered this? This statement is wholly inaccurate. Look at the stats DCC have released. 95 pupils at Tipton School. 38 from Ottery.

That leaves 57 not from Ottery i.e. the vast majority. So, the opposite of this statement is true – there will in fact be MORE traffic movements as MORE people will be travelling into Ottery. They are placing a primary school on the outskirts of a town, up a substantial hill, where the access will be via a main road where vehicles are perceived to regularly travel over the speed limit and in a dangerous manner. Other than children living in very close proximity to the school I cannot see families walking/cycling to access this school.

This seems to go completely against planning a future for the country in a 'green, environmental' way.

7) Agricultural Land: At present, the land which the proposed School and Housing estate are to be built on is leased to a farmer and actively farmed. Animals are grazed on the lower fields throughout the year and crops are grown on the upper fields. I feel very strongly that farming land should remain farming land.

The recent Coronavirus with subsequent food shortages in the shops and disrupted food supply chains highlighted how important it is that we support our farmers. If we continue to dramatically reduce our farmland then we will struggle even more during potential future pandemics (or indeed with the current pandemic).

Also, to help the environment we should reduce our 'food miles' and therefore, food grown locally is the best. Why is this housing estate even being considered on agricultural land when all the local plans clearly & explicitly state Ottery has no need for housing? What is the agricultural land and soil grading at the Thorne Farm Land? Has this even been assessed? Further, is it better to use 'Brownfield' sites for building? What other options have DCC looked at? They were not transparent at the Consultation about what other options they have investigated. Has the closed hospital building in Ottery been looked at? Or the wasteland opposite the hospital which is closer to town? Do the houses 'need' to be built in Ottery or could DCC build elsewhere & use this money to fund the school? Please see appendix 7.

8) School Build Funding. I understand that the central government has money available for building schools and has just recently released a 'pot' of money for rebuilding schools. Could this money be accessed for building a new school in Ottery?

The school could then be built without the 'need' for housing & would leave Kings School a substantial amount of land for future development. I understand that the current proposals do not allow this due to the School's CoE status. I understand that the CoE are only offering a small percentage of the rebuild costs.

The question needs to be asked whether maintaining the CoE status is best for the Ottery St Mary Community? Given that potentially funds could be gained for a new state school. See Appendix 8.

9) Financial Viability of the Project: DCC have stated they have a £5 million shortfall in the money they require to build the new school. They also stated in their consultation document that they expect this housing development will generate £1 million towards Ottery's community infrastructure.

They also need money to alter the road layouts of Barrack Road & Cadhay Lane/some sort of traffic calming measure outside Kings School – the costs of which will be unknown as they haven't yet found a solution to this!

In addition, I understand from the Neighbourhood Plan that money would need to be contributed to the Pebblebed Heaths (Environment and Green Infrastructure As Ottery St Mary is within 10km of the Pebblebed Heaths European Site, financial contributions towards Habitats Regulations Assessment non-infrastructure mitigation are sought from all new residential development at the town (priority one).

They also need to put up protective fencing around the airport beacon & pay for additional security costs at The Kings School. How will 150 houses generate in excess of £6 million?? That is in excess of £40,000 per house.

The viability report presented in the planning application even shows that building 150 houses with just 30% of them social housing (is the government criteria that this percentage should be higher when building outside the built-up area boundaries?) will not raise the £5 million that DCC say they need to build the school.

Their own report shows that this is not a viable way to raise the funds required! DCC do not appear to have included any reports/data in their application on the costings of the proposed primary school – how did they come by the figure of the cost of the new school/that £5 million is required? Is this even an accurate estimation? Could it be more?

10) Personal Objections. At the moment my house and garden overlooks one of the fields which the new housing development and roads are planned in. Having either back gardens (according to the consultation document) or roads (according to the planning documents) in place of the field will greatly impact on the privacy of both my home and garden.

There will also be increased noise pollution from a road and light pollution from the street lighting. If trees are installed adjacent to my garden this will affect the light that my garden receives. When my home was built in Cadhay Close, the properties in the close were required to be built on the existing footprint of the farm buildings to be in keeping with the local area/history. What was the purpose of this if the close is 'swallowed' up by a large estate?? I would also urge you to consider the responsibilities of the council under the Human Rights Act in particular Protocol 1, Article 1 which states that a person has the right to peaceful enjoyment of all their possessions which includes the home and other land. In respect to noise, smell and pollution, I believe that the proposed development would have a dominating impact on all properties directly adjoining this site (including my own) and their right to the quiet enjoyment of their property.

Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of *Britton vs SOS* (1997 JPL 617) the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.

This proposed development would have a direct impact on my private and family life, and that of my neighbours. I would also like you to consider the Ottery St Mary Neighbourhood Plan. This states: "Policy NP25: Land Identified for Education uses in Ottery St Mary, Land to the west of the Kings School, as shown on the East Devon Local Plan 2013- 2031 Proposals Map, is safeguarded for education or community use, with strong preference to be given to meeting the educational needs of the Neighbourhood Plan Area.

Development for education or community uses will be supported provided the following criteria are met: '3. Development will not lead to an unacceptable impact on the amenity of surrounding residents;'" This proposed development will not meet this criteria. I am one of these residents and I strongly oppose to this housing development as it will have an unacceptable impact on my family & I.

11) Environmental Concerns: These are numerous. Hedgerows, which are vital to the British Wildlife, will be destroyed during the building of the school and estate. Of the hedgerows which are left, who will be responsible for maintaining them?? DCC's own 'Ecological Addendum' even states "In summary, the development of this Site could cause adverse impacts to dormice and commuting and foraging bats via the loss of hedgerow and grassland." And "Under UK and European law (see Appendix 2), it is an offence to kill, injure or disturb a dormouse and to damage or remove its habitat."

The very nature of the suggested development will be damaging and removing the Dormouse's habitat. Another stand-alone reason why this development should NOT go ahead! DCC's ecological survey also states that there is a badger sett on the site and badgers are another protected species. It appears that DCC has not followed the Government's own advice in regards to the Badger Sett. According to the Government website <https://www.gov.uk/guidance/badgers-surveys-and-mitigation-for-development-projects> a survey for badgers should have been completed (Survey for badgers if: there are signs of setts or badgers in the development site or nearby / historical or distribution records show that badgers are active in the area or there is suitable habitat for sett building).

The same website also says that a 'bait-marking' survey should be carried out for the badgers (Bait marking - You should carry out a bait marking survey to find out: - the territorial boundaries of different badger groups in an area affected by a development project - if there are alternative setts used by the same badger group nearby which badgers could move to if a sett is destroyed - the best site for a replacement artificial sett, if needed) I can see no report to show that shows that DCC have carried out a detailed Badger survey – surely this is crucial?

As I understand it badgers can have several setts over a wide area so for DCC to continue to plough ahead with their plans and designs without a knowledge of exactly where the Badgers Setts may extend to seems ludicrous. Also, DCC have set out on their plans a '20m buffer around the badger sett.' According to <https://insideecology.com/2018/08/22/badgers-and-planning-a-practical-guide/> - the buffer zone should be 30m.

However, if you go by the advice of: http://www.badgerland.co.uk/help/solutions/planning_permission.html they state that "In terms of how much room, we'd advise on there being an absolute minimum distance of 20 metres from the sett entrances to a surrounding fence. Ideally, there would be double that amount or even more." It looks like DCC are going by the absolute minimum required and this surely is not good for a protected species?

12) DCC's planning statement says: "Whilst the proposed residential development is not in accordance with the Local Plan Strategy 7 in that it would be located outside the Built Up boundary, the site is adjacent to the existing Built Up Area." Text accompanying Strategy 7 states: "Development in open countryside outside defined boundaries will be resisted, unless on the merits of the particular case, there is a proven agricultural, forestry or horticultural need or it will meet a community need that is not, or will otherwise not be met or there is another clear policy justification".

DCC state that the proposed housing development is required to make the provision of the new primary school viable and without the residential development this 'community need' will not be met. The community need for additional primary school provision is recognised in Local Plan Strategy 24 Development in Ottery St Mary." I strongly dispute this.

Whilst Ottery St Mary has expanded as a town, neither of the school years were full when my children commenced at Ottery St Mary Primary School (in 2017 and 2019 intakes). When I questioned DCC on how many children who are in the Ottery Catchment were unable to go to Ottery Primary their response was there are currently NO children transported out of Ottery by DCC on 'school full' grounds. Which implies the families in Ottery whose children do not attend do so out of choice, than necessity.

Also, Ottery St Mary Primary School has a lot of 'out of area' children attending. There are some children from 'out of area' in both of my son's classes. Surely, they could increase capacity at this school by not accepting 'out of catchment' pupils.

Also, nationally, pupil numbers at schools are predicted to decrease by 5.2%, not increase! If Ottery St Mary requires more primary school places can the current primary expand? Has this been investigated? If it cannot expand, is there funding available to build a new school in Ottery from central government?

Thereby meeting the needs of the community WITHOUT the excess housing....The Ottery St Mary & West Hill Neighbourhood Plan identify that Tipton St John School may need to relocate but it does not say where & it does not identify the need for more houses, the opposite in fact! Please see appendix 12.

13) The Kings School expansion - I think it is very short-sighted to not leave substantial land for The Kings School to expand in the future. The Ottery St Mary Neighbourhood Plan states '9.20 There has been a recent proposal and consultation about building this new primary school to serve Ottery St Mary and Tipton St John on land to the west of The King's School in Ottery St Mary which was safeguarded in the East Devon Local Plan for educational use.

The intention in the Local Plan was to safeguard this land for future use by The King's School, which is currently at capacity'. If Kings School is at capacity now how will it cope with all the extra children from all the new housing estates in Ottery, let alone another one? In DCC's planning proposal a small section of land which can apparently house eight classrooms has been designated for The Kings School.

However, I am certain that if there are 8 more classrooms the school will require other infrastructure to support all these extra students and will therefore require space/land for this infrastructure. It is also not in the spirit/intention of either the Ottery St Mary Neighbourhood plan or the East Devon Local Plan to provide a minimal amount of land for The Kings School and a maximum amount for housing - it has been safeguarded for educational and community purposes and to be used for any other purposes is reprehensible.

The Ottery St Mary Neighbourhood Plan also states 'Policy NP25: Land Identified for Education uses in Ottery St Mary Land to the west of the Kings School, as shown on the East Devon Local Plan 2013- 2031 Proposals Map, is safeguarded for education or community use, with strong preference to be given to meeting the educational needs of the Neighbourhood Plan Area.

Development for education or community uses will be supported provided the following criteria are met: 7. Development of the site will not compromise the ability of The Kings School to expand in the future.' I strongly believe that leaving The Kings School such a minimal amount of land will severely impact on its ability to expand in the future.

The Greater Exeter Strategic Plan (which covers East Devon) is currently in the consultation phase and will set out strategic policies and proposals for building and land use up to 2040. This plan, whilst still in the planning/consultation stage, suggests having 2800 new houses built in Feniton.

Feniton is in The Kings School catchment area. The GESP states in reference to this proposal 'On-site primary school provision including early years plus additional secondary places'. Where will these additional secondary places be if all the land surrounded by The Kings School is turned into a housing estate? Will this school be over more than 1 site? Or will a whole new secondary school need to be built because houses are allowed to be built on land safeguarded for education??

The GESP has been written in partnership with DCC - has DCC not considered this potential need to substantially increase capacity at The Kings School when it was formulating the GESP? It appears that DCC are looking at each of their schools/plans in isolation with absolutely no joined up thinking. This sort of planning will not lead to a better future for East Devon.

14) The design of the school - the plans that DCC have submitted show the school building, car park and a sports field. It does not indicate any hard outdoor PE area, as it should, as stipulated in the government guidance for new schools.

It also does not indicate any hard informal and social areas, again stipulated by the Government guidelines. It does not appear to have looked at the potential for an on-site preschool. Tipton St John Primary School currently has a pre-school. Will this new school have one? Presumably if it does it will need to be bigger than the current one at Tipton as they are planning a bigger school. In that case, more parking/building/playground area will be required so it does not look like they have made an accurate representation on the plans of the actual size of the school.

17) Quarry: As I understand it, there are planning proposals for a quarry to be sited very close to the proposed site of the primary school. How will this impact on the school if both the quarry and the school go ahead - will noise and dust from the quarry affect both the health and education of both the children and staff of this new school? How about the flood risk to Ottery if a quarry, houses and a school are all allowed?

18) The surrounding area. Very close to the proposed site is the Grade 1 listed building Cadhay House. How will the proposed building affect this property? There are medieval fishponds in the grounds of this listed building - will these be affected at all by the proposed development? Has this been considered by DCC? Have any experts done a survey into the water supplying these fishponds (which I understand are fed by Cadhay Bog/land near Cadhay Bog)?

As I understand it the proposed area will be able to be seen from East Devon Area of Outstanding Beauty, has East Devon Area of Outstanding Beauty been consulted on this planning proposal?

19) Timing & publicising of the planning application: I feel that the timing of this planning proposal is horrendous - with myself and a lot of people feeling stress & anxiety due to Covid-19, this then adds significantly to the stress. It has also been cleverly timed during the summer holidays when people normally passing the site to get to Kings School, who may have real concerns about their child's road safety, will not see the small signs put up by DCC, local people may be on holiday etc.

I would also like to add that DCC seem to have done the 'bare minimum' in informing Ottery St Mary residents of this planning proposal. They also have inconsistent dates on their documents – the letter we received stated comments needed to be submitted by 15th August, yet the signs they put up stated comments need to be submitted by 23rd August. The EDDC Website also states the 15th August.

This inaccuracy in DCC's ability to do due diligence and even put the correct dates on their documents may result in people missing the cut-off time for comments, which seems highly unjust. 20) The accuracy of the design: there are only 120 properties shown on the proposed design despite DCC stating they require 150 houses. Why is this? Surely this is a misrepresentation of what the completed development will look like?

I would also be very interested in seeing a 'to scale' map of the proposal as, due to the reasons outlined in point 14, it does not appear as if enough space has been given to the school to meet the Governments requirements. Thank you for taking the time to read through my objections and my concerns. I hope that you will consider them seriously as this proposal, particularly the housing aspect of it, is a great concern

Kind regards,

Kerry Carr