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

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Sustainability appraisal

Full name: Sara Davies

Organisation (where relevant): Lymptstone Water Quality Group

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 is very weak on water quality, flood risk, and biodiversity. It demonstrates poor understanding of these issues, their interrelationship, and the need for an integrated water management strategy to adapt to climate change effectively (see <https://catchmentbasedapproach.org/wp-content/uploads/2018/09/Planning-Advice-Note.pdf>).

This is a fundamental flaw which makes the draft Local Plan unsound and noncompliant with national policy and planning requirements, as explained in my comments on the vision, spatial strategy, adaptation to climate change, development in towns and villages, and other chapters.

For example:

- The section on climate change adaptation only includes flood risk, not water quality and biodiversity.
- The appraisal of sites in Lymptstone for climate change adaptation and water resources is incorrect, and is likely to be incorrect for other sites. Serious errors have been made, e.g., stating under water resources that 'development at the sites (in Lymptstone) is unlikely to have any significant effects on water quality and quantity as none are located in a groundwater protection zone', when surface water runoff from these sites presents a major risk of water pollution and flooding. The surface water flows to a vulnerable brook (with low base flow) and then to the Exe Estuary, a 'European site', SPA, SSI, and Ramsar site. Lymptstone is also recognised by the Environment Agency as a community at risk of flooding from a combination of surface, fluvial and tidal sources.

There is also no evidence in the 'Evidence Library' that water quality issues have been seriously considered.

Full name: Dan Trundle

Organisation (where relevant): Black Box Planning Ltd

Other party name (if relevant): of Greenhayes (Greendale Group / Crealy Farms)

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.:

4.1 NPPF Paragraph 33 requires that local plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).

4.2 The Planning Practice Guidance (PPG) further explains that a sustainability appraisal is a systematic process that must be carried out during the preparation of local plans. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

4.3 At the time of writing, it is understood that Sustainability Appraisal (SA) (ref CSD-003) – Appendix Six and pages 265 through 280 represents the full extent of the Council SA work in respect of consideration of the Second New Community.

4.4 Firstly, it is somewhat surprising for such a critical component of the Council's Plan and overall spatial strategy, that the SA work extends to only 15 pages of a 614-page document. This point is especially pertinent in consideration of the reasonable alternatives, the complexity of these and their requisite assessment in order to arrive at an evidenced and methodical conclusion.

4.5 Secondly, whilst it is understood that the SA is required to assess reasonable alternatives, and that the Options from the October 2022 CBRE report were chosen as the basis for undertaking that assessment, there is little in the way of discussion around alternative options or sub-options for assessment.

4.6 By way of example, despite Greenhayes submitting a representation in January 2023 definitively confirming the extent of their land control and the basis on which a strategic promotion could be brought forward and contribute towards the Council spatial strategy and objective to deliver a Second New Community, the reasonable alternative

assessed by the SA in February remains as per the broad Option 2 set out in the October 2022 CBRE report.

4.7 Option 2 is not consistent with the Greenhayes promotion land control as set out in the January 2023 Regulation 18 representation, instead it is based upon more outdated 2017 and 2021 Call for site submissions. Indeed, the very western extent of the Greenhayes promotion straddles into Option 3. The SA itself acknowledges on page 266 that land not being submitted to a Call for sites exercise would not necessarily prevent it from being considered.

4.8 The SA sets out on page 265 that:

- The Local Plan 2020-2042 will allocate land for 8,000 homes and accompanying employment, services and facilities etc, but there is a longer term vision for 10,000 homes at the new community;
- Long lead-in times and build-out rates for a new settlement mean that 3,300 dwellings are proposed in the plan period up to the year 2032;
- The remaining 4,700 dwellings would be delivered after 2042 on the remainder of the allocated land;
- The land required for the additional 2,000 dwellings and associated land uses will be allocated in a future Local Plan.

4.9 The SA recognises that the location of the three options recognise existing land uses that are not likely to relocate, such as Greendale Business Park and Crealy Theme Park and Resort. Nevertheless, Option 2 appears to wash over both land uses. The Greenhayes promotion demonstrates how the co-location of residential uses with these employment hubs and ensuring strong links between them, could contribute significantly to meeting wider sustainability objectives, including reducing the necessity to commute by private vehicle and to encourage active travel as part of the daily commute.

4.10 The assessment in SA Objective 4 and 13 and also the conclusion that Option 2 is isolated from existing cycle infrastructure, fails to recognise that the Clyst Valley & New Communities Local Cycling and Walking Infrastructure Plan (LCWIP) January 2025 (ref TRI-018) identifies the A3052 Sidmouth Road as a critical active travel route that all new settlement options will further increase demand upon. It is stated that ‘a high-quality protected route, separated from the carriageway by a buffer should be delivered between Clyst St Mary and Greendale. To include crossing points (e.g. signalised crossings) for the Clyst Valley Trail, Cat & Fiddle, Crealy, and Greendale. This would required engagement and negotiation with landowners’.

4.11 Option 2 is the only option which would offer land control on both sides of the A3052 corridor to enable delivery of the critical active travel route as set out by the

LCWIP. It would also be the only option which would enable the delivery of the requisite connections into Crealy and Greendale.

4.12 The assessment in SA Objective 4 recognises the potential in Option 1 for a low carbon district heating network by connecting to the proposed Energy from Waste (EfW) plant at Hill Barton. However, it fails to consider that Option 2 would also benefit from this facility, given its location adjacent to Hill Barton Business Park and the Local Development Order boundary for the District Heating Network.

4.13 It also fails to recognise that Option 2 would also enable opportunities to build upon the existing energy infrastructure at Greendale Business Park in the form of the anaerobic digester facility. The plant currently processes farm crops and livestock manure into biogas and bio fertiliser. The biogas is used to produce electricity for the Business Park, whilst the bio fertiliser is used in local agricultural practice in place of fossil fuel derived fertilisers.

4.14 The assessment in the conclusion that Option 2 is in multiple ownership with significant land assembly required is unfair in consideration of the same challenges that would equally apply to Options 1 and 3. The Greenhayes promotion predominantly to the south of the A3052 is a single entity with two landowners involved. In consideration of the HELAA mapping, the landownership to the north of the A3052 appears more granular meaning that the same land assembly challenges will equally apply to Option 1.

4.15 In respect of SA Objective 8, it is unclear why Option 2 does not score better than Option 3 in consideration that the SA acknowledges that “a relatively large proportion of the land in Option 3 has not been submitted by the landowners”. An inconsistent approach is unlawful on the basis that it would be irrational.

4.16 The assessments in SA Objectives 10 and 12 fail to acknowledge the established hub of facilities and services at the Greendale Farm Shop site, including a café / restaurant, farm shop, nursery, medical facility and various tourism and visitor attractions.

4.17 The assessment in SA Objective 11 that Options 1 and 3 benefit from employment opportunities arising from proximity to Exeter, yet Option 2 is limited only to employment opportunities arising from Greendale and Hill Barton Business Park is nonsensical. Option 2 equally benefits from such a location and sits on a direct public transport route and proposed active travel corridor into the city.

4.18 It is recognised that Option 1 provides ease of access to several employment hubs around the A30 corridor, but the Greenhayes promotion would achieve the same objectives through proximity to Crealy and Greendale Business Park. The business park is home to approximately 150 companies, providing approximately 2,000 no. jobs in the

local Exeter and East Devon economy. The park comprises over 1.8 million square feet of existing industrial and commercial space hosting a variety of business tenants.

4.19 It is recognised that, in preparing the Sustainability Appraisal, a number of the core sustainability objectives will need to be assessed by applying evaluative judgement. This can account for differences in opinion in assessing the document. However, if such judgements are applied having regard to inaccurate information or on an obviously inconsistent basis, the Sustainable Appraisal will not be legally compliant. That is the case currently.

4.20 It is recommended that in reviewing and incorporating the full evidence base to support the Local Plan as part of a full Regulation 19 Consultation, and meeting full objectively assessed needs, that a further iteration of the SA is prepared to amend the inconsistencies.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

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.:

1. Biodiversity

The Site is supported by a Preliminary Ecological Appraisal (PEA) to identify important ecological features. The PEA found the Site to be dominated by uniform agricultural land of low ecological value, both arable crops and cattle pasture.

It is noted that there are designated sites of international importance within a 10km radius of the Site. Mitigation for recreational impacts that may occur to these sites from an increase in residents would be secured as part of the proposals, in the form of financial contributions towards improved access management and provision of substantial alternative recreation locations. The concept masterplan also proposes extensive areas of public open space which will include walking routes and will present an alternative option.

The Site will not have an unacceptable impact on biodiversity. It is welcomed the EDDC's HELAA (2022) concluded that the Site would have no unacceptable impact on biodiversity.

2. Landscape

The Site is not located within any statutory or nonstatutory landscape character or quality designations. The northern part of the Site benefits from intervisibility between the Site and Clyst St George. It is acknowledged that the southern part of the Site is on slightly elevated ground and the proposed masterplan demonstrates how the new village can be delivered sensitively in respect of its landscape context.

It is welcomed that the HELAA (2022) assessment concluded that the Site would have no impact on NLs.

3. Historic and built environment

It is acknowledged that Clyst St George Church (Grade II) is located to the north west of the Site and there are locations within the Site which have some visibility of the church tower.

The proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. Key view corridors have been retained and are proposed as green space to ensure that the intervisibility of the church tower can be preserved.

It is agreed that the HELAA (2022) assessment concluded that the Site will not have an unacceptable impact on heritage.

4. Climate change and carbon emissions - To minimise greenhouse gas emissions

The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements, new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond.

We support the HELAA (2022) recognition that “the site is within 1,600 metres of 4 or more different local facilities and within 1,600 metres of a train station or bus route with an hourly or better service”.

5. Climate change adaption - To adapt to the possible effects of climate change

The Vision Document demonstrates that any areas of the Site at risk of flooding (from all sources) would be kept free from development. Any future scheme would be supported by a comprehensive drainage strategy that would demonstrate that the proposed development would be safe for its lifetime. In accordance with DCC aspirations, the proposed development would seek to deliver a betterment to existing greenfield run off rates, therefore delivering a minor positive effect.

6. Land resources - To utilise our land resources efficiently and minimise their loss or degradation

The majority of the Site comprises of Grade 3 (good to moderate) land classification. The Site is not affected by not affected by minerals, waste, nitrate or phosphate zones.

7. Water Resources - To utilise our water resources efficiently and minimise their loss or degradation

The Site is not within a groundwater source protection zone or the River Axe SAC phosphates catchment.

8. Homes - To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure to meet East Devon's needs

Addlepool Village will be a self-contained new village, whilst connecting the development both visually and physically to the existing surrounding settlements of Ebford and Clyst St George. The proposals will include approximately 700 homes

(including both market and affordable homes), making a significant contribution towards EDDC's local housing need in the short to medium term.

The Site is owned by a single landowner and under the control of Vistry Group, who as the largest housebuilder in the UK by number of dwellings completed annually, are well positioned to both promote and construct the proposed new homes, seeing the project through from inception to completion.

9. Health and well-being - To support healthy, safe and active communities where people have access to attractive and functional recreation spaces

Addlepool Farm will be a self-contained new village, providing significant areas of new public open space, which will include allotments, sports pitches and walking routes, centred on health and well-being of future residents.

The proposed development will meet and contribute to the objectives of the Clyst Valley Trail and wider network.

10. Access to services - To provide accessible and attractive services and community facilities for all ages and interests

The Site is in close proximity and with good connectivity to the main district and regional centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is served via several bus services, including 56, 57 Gold, 58C and the 95. These routes provide connections to Topsham, Woodbury, Exeter and the villages in between. The nearby station at Topsham is located approximately 1 mile (1.6km) to the west of Addlepool Village. Great Western Rail service provides connections to Exeter, Plymouth, Taunton and beyond, including London Paddington.

The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements,

new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond.

11. Jobs and employment - To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity

The delivery of the proposed development will create numerous construction jobs and will contribute to the local economy through construction workers' spending. The provision of an onsite community hub will also deliver additional economic benefits through the creation of new employment.

12. Town centres - To safeguard and strengthen the vitality and viability of town centres

The proposed development is in proximity to Topsham and therefore the future occupiers of the development will contribute to the long-term vitality and viability of East Devon's towns. The proposed development will not compete with the facilities and services on offer in nearby Topsham, however, will provide some on-site retail to meet basic needs.

13. Connectivity and transport - To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon

The Site is in close proximity and with good connectivity to the main district and regional centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is served via several bus services, including 56, 57 Gold, 58C and the 95. These routes provide connections to Topsham, Woodbury, Exeter and the villages in between. The nearby station at Topsham is located approximately 1 mile (1.6km) to the west of Addlepool Village. Great Western Rail service provides connections to Exeter, Plymouth, Taunton and beyond, including London Paddington.

The Site is located in an area with superfast broadband (30mbps plus) as a minimum.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).

Appendix 1 4927_107_A Site Location Plan Final.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1745579318/projects/6734d674023a1f95dd0a926c/respondent-upload/xoz3o3niqiefczi0ajdl.pdf>; Appendix 2 4927_05_B Vision Document-compressed.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1745579327/projects/6734d674023a1f95dd0a926c/respondent-upload/o0gkytyb06hdvi2axify.pdf>; 250326 Addlepool Farm EDDC Regulation 19 Representations.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1745579316/projects/6734d674023a1f95dd0a926c/respondent-upload/q0bojgsjzsapognaocup.pdf>; 250327 Addlepool EDDC Reg 19 Representation Form.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1745579314/projects/6734d674023a1f95dd0a926c/respondent-upload/olffaustzza18zszq3h.pdf>

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

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.:

4.2 The Council have assessed Land off Northcote Hill against the Sustainability Appraisal (SA) Objectives (site reference GH/ED/39a and GH/ED/39b) and prepared a site assessment, set out below.

4.3 On review of the SA, we are able to provide additional evidence to support the assessment of the site. It is considered that this additional evidence will enable an updated site assessment to be considered by the Council, with regard to objectives relating to transport and landscape. The current SA has restricted the site's capacity 200 homes (100 homes for site reference GH/ED/39a and 100 homes for site reference GH/ED/39b).

4.4 Boyer has undertaken a critique of the Council's assessment (set out below) and prepared a revised site suitability assessment. With this revised assessment the site is evidenced to be a suitable site that can accommodate a greater quantum of development, allowing for the draft allocation to be subsequently increased within the Draft LP.

The above revised site suitability assessment for land off Northcote Hill, Honiton (land north and south of the railway line), which has been assessed using the site's specific technical notes prepared by relevant technical consultants, demonstrates that the site can deliver 285-300 homes on land south of the railway line, and in excess of 100 homes on land north of the railway line, and continue to positively contribute towards EDDC's Sustainability Objectives.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: 250224 Northcote Hill Honiton EDDC Regulation 19.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744110146/projects/6734d674023a1f95dd0a926c/respondent-upload/zfbdss4jmvxvhrwaqje2.pdf>

Full name: Helen Beaven

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 impacts of the various sites proposed are almost bound to be understated, judging by the impacts of previous developments.

Full name: Dr Paul Bridge

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 12 states that the Axe Valley is an SAC. This is a high level European water quality designation. The section from the confluence with the Blackwater to Colyton Bridge is also an SSSI under the UK legislation which requires further consideration above just nutrient levels. Paragraphs 12-14 include specific references to water quality and levels in the River Axe and indicate that building may not be possible due to these factors, but do not also consider the SSSI status of the lower section of the river where it flows through Axminster. The potential for flooding in the Axe valley is also mentioned in paragraphs 35 and 37. The development of green field sites around Axminster will inevitably lead to less surface water retention and greater run-off into the River Axe. These factors do not appear to have been considered in the site selections at Axminster where sloping sites directly adjoining current high flood risk areas have been chosen. Paragraph 45 considers negative effects on biodiversity and this is of particular concern at the Axminster greenfield sites where development of open grassland and associated hedgerow loss can only be predicted to have a negative effect on biodiversity and will not result in the legally required 10%BNG given in paragraph 47. There appears to be no consideration of the range and extent of habitat required by protected species and preservation of bat roosts at Beer or the otters in the Axe rely on their surrounding habitats to be maintained. Sites selected at Axminster include some known to form part of the Beer Quarry bat range (admitted in the evidence document, but other protected and priority species in the area including otters, Golden dormice and Oak polypores have not been mentioned. Paragraph 55 implies that negative effects on water quality, flooding and biodiversity were considered in site selection but the site descriptions for Axminster sites do not appear to have attached any weight to these and some of the rejected sites have less negative constraints. There would appear to be a lack of justification for the current site selections and the constraints given in paragraphs 12,13,14,35, 37 and 45 would prevent development at most of the Axminster sites if they were applied to them.

Full name: Beth Cairns

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.: These comments relate to point 33 in the sustainability appraisal, specifically housing allocation in Exmouth.

Exmouth is identified in the local plan as the only Tier 1 settlement designated for significant growth and development.

Among the development sites allocated under SD01, Exmo_20 is the largest, with a proposal for approximately 700 homes, followed by Exmo_17, which plans for 410 homes. Consequently, Exmo_20 represents 48% of the total housing allocation in SD01 for Exmouth, comprising 700 homes compared to 755 homes across all other designated sites.

Given the substantial share of new housing attributed to Exmo_20 and Exmouth's key role in the broader local plan, the allocation of this site represents a major procedural failure. This is particularly concerning as Exmo_20 was previously deemed unsuitable during the HELAA site sifting process. Normally, a failure at an early selection stage would prevent further consideration in later assessments.

Since Exmo_20 was ruled unsuitable at HELAA stage 2, it was not subject to further review:

At HELAA stage 2, Exmo_20 was categorized as "not suitable or achievable."

Due to this designation, it was excluded from Regulation 18 consultations.

However, on 3/9/24, its status changed from "ongoing assessment" to "allocated."

Despite this shift, there was no opportunity for public consultation or review by the Strategic Planning Committee, leaving the evaluation of Exmo_20 incomplete.

It is highly concerning that the largest proposed development within the only Tier 1 settlement has not undergone full scrutiny. This omission undermines the credibility of the plan. Given the scale of the project, its critical role in Exmouth's development, and Exmouth's overall importance in the region, it is essential that the full planning process is properly followed and its conclusions upheld.

Full name: Matthew Cairns

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.: These comments relate to point 33 in the sustainability appraisal, specifically housing site allocations for Exmouth.

Exmouth is identified in the local plan as the only Tier 1 settlement suitable for higher levels of growth and development.

Of the development allocations listed for Exmouth under SD01, Exmo_20 is by far the largest (at around 700 homes), the next largest being Exmo_17, with 410 homes listed.

Exmo_20 therefore represents 48% of the homes in SD01 for Exmouth (700 proposed homes in Exmo_20, and 755 in total being under other development allocations).

Given the share of new homes that this development will provide, and the obvious importance of Exmouth to the local plan as a whole, it seems an obvious failure of process for this site to have been allocated despite the Exmo_20 site previously being ruled out as an unsuitable site in the HELAA site sifting stage.

In no other situation would failure at an early stage of a selection process allow subsequent assessment stages to be sidestepped.

As a consequence of Exmo_20 being ruled out as unsuitable at HELAA stage 2, it was not scrutinised further:

- Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2).
- As a direct consequence of the HELAA stage 2 result, the site was omitted from regulation 18 consultations.

- However, on 3/9/24 the site status changed from 'ongoing assessment' to 'allocated'
- No further consideration or representation was permitted to the public or the Strategic Planning Committee, despite the assessment of Exmo_20 being incomplete.

It is seriously concerning that the largest development in the only Tier 1 site in the Local Plan has not been through the full process of scrutiny and consideration, and this aspect of the plan is clearly not sound in this respect.

Given the size of the proposed development itself, its importance in terms of its intended contribution to the development allocation in Exmouth, and the importance of Exmouth to the area as a whole, it seems obvious that in order for the plan to be sound, the correct process should be followed - in its entirety - and the results of that process respected.

Full name: kirsty anne cross

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, the document 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.”

However, it is unclear why only Exmo_04 can be amended while Exmo_20 remains allocated despite being within the same 400-metre exclusion zone. This inconsistency is unjustified, and to ensure fair and sound decision-making, both the site allocation and settlement boundary must be repositioned at least 400 metres from the Pebblebed Heaths.

On p.342, Exmo_20 is listed as a preferred alternative for Exmouth, yet it previously failed the HELAA assessment, being deemed “not suitable or achievable”. According to section 2.4 of this Sustainability Appraisal report, a site that has failed HELAA cannot be considered a preferred alternative. This contradiction renders the document inconsistent, unjustified, and unsound.

On p.343, the reasons for rejecting sites include:

“Exmo_04b – Land at Marley Drive is rejected due to major adverse biodiversity effect arising from its location within 400 metres of the Pebblebed Heaths exclusion zone.”

This decision is inconsistent with the allocation of Exmo_20, which is also within the 400-metre exclusion zone. Allowing Exmo_20 while rejecting Exmo_04b on the same grounds is unjustified and unsound. To maintain consistency and adhere to policy, the

site allocation and settlement boundary must be repositioned at least 400 metres from the Pebblebed Heath.

Full name: kirsty anne cross

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 Adaptation commentary (p.336), there is no mention of the flood risk present at the lowest end of Exmo_20. Additionally, it is not acknowledged that this large greenfield site entirely drains into Withycombe Brook, a watercourse with significant identified flood risk in Exmouth. Despite this, Withycombe Brook has not been assessed in the Strategic Flood Risk Assessment of the draft Local Plan. The 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.”

Given that Withycombe Brook runs through the centre of Exmouth, the largest settlement in East Devon, and considering the substantial size of the Exmo_20 allocation upstream, its omission from the flood risk assessment is unjustified.

In the Exmouth Sites Access to Services commentary (p.338), a 1,600-metre figure is cited, which should instead be 800m, as the 1,600m represents a round-trip distance. The Local Plan references on p.186 are outdated or broken, but both the Government’s National Design Guide and Sustrans’ "Walkable Neighbourhoods" confirm that 800m is the standard walkable distance, with 1,600m as the total trip distance. Furthermore, distances should be measured from the site centre, not the nearest point, as Exmo_20 itself extends over 800m in length. Additionally, the main site access is now onto the B3179 country road, which must be considered in this assessment. Using the 1,600-metre figure is therefore unjustified.

In the Exmouth Sites Connectivity and Transport commentary (p.340), it is incorrectly stated that Exmo_20 is within 800m of the A376—this claim is inaccurate and therefore unjustified. As with other assessments, distances should be measured from the site centre, not the nearest point, especially given the site's considerable length. The main site access via the B3179 country road should also be a material factor in this evaluation.

Given these inconsistencies, alternative sites identified as preferred in the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected instead of Exmo_20.

Full name: kirsty anne cross

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 Biodiversity objective (p.331/332), both Exmo_04 and Exmo_20 receive a double negative (--) score. However, the commentary and conclusions regarding these sites are inconsistent and unjustified. While Exmo_04 results in a partial allocation outside the 400m buffer zone, Exmo_20's allocation extends directly adjacent to the protected site, raising concerns about its impact.

In the Exmouth Sites Historic Built Environment commentary (p.334), the large size of Exmo_20 is assumed to minimize adverse impacts, resulting in only a minor negative effect. However, this assumption is flawed. Firstly, the site was significantly reduced in size following a review of ownership after its allocation on 3rd September 2024. Secondly, the top 400m of the site is unsuitable for housing. Thirdly, the remaining area is necessary to accommodate 700 houses, leaving little room for mitigation measures. Given these factors, the assumption that mitigation can be incorporated is insufficient justification for its allocation.

In the Exmouth Sites Climate Change and Carbon Emissions commentary (p.335), the stated figure of 1,600 metres should instead be 800m, as the 1,600m represents a round-trip distance. The Local Plan references on p.186 are broken or outdated, but the Government's National Design Guide specifies 800m as the standard walkable distance, as does Sustrans' "Walkable Neighbourhoods" guidance. Furthermore, distances should be measured from the site centre, not the nearest point, as Exmo_20 itself spans over 800m in length. Additionally, the main site access is now via the B3179 country road, a factor that must be considered when assessing sustainability. Given that this site is not in a sustainable location, its allocation is inconsistent with national policy. Instead, alternative sites identified as preferred in the Agenda for the 3rd September 2024 Strategic Planning Committee meeting should be selected in place of Exmo_20.

Full name: kirsty anne cross

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:

“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.”

Allocating Exmo_20 would contradict this objective, as the site serves as a supporting habitat for foraging Nightjars. Additionally, Exmo_20 is situated within SNA 368, which has been designated for inclusion in the Devon Local Nature Recovery Network (LNRS) under the Environment Act 2021. Allocating this site would therefore conflict with efforts to conserve and enhance natural habitats and wildlife, making the decision unjustified. Instead, alternative sites identified as preferred in the Agenda for the 3rd September Strategic Planning Committee meeting should be allocated in place of Exmo_20.

Furthermore, on pages 11–12, the document states:

“4. Climate change and carbon emissions. Development that minimises the need to travel by providing access to public transport, cycle.”

Exmo_20 does not align with this principle, as it is in an unsustainable location with the primary access point leading onto the B3179 country road, increasing the need for travel. Given this, allocating Exmo_20 is unjustified, and alternative, more sustainable sites from the 3rd September Strategic Planning Committee meeting should be selected instead.

Additionally, Figure 2.4 (p.18) outlines the Site Criteria to be Considered as a ‘Reasonable Alternative,’ confirming that Exmo_20 does not qualify. The site previously failed the HELAA stage, being classified as “not suitable or achievable” (HELAA Appendix E(v)1). Therefore, its allocation lacks justification, and other preferred sites

from the 3rd September 2024 Strategic Planning Committee meeting should be selected in its place.

Full name: kirsty anne cross

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 incorporate the Mitigation Hierarchy, which emphasizes avoidance as a priority over mitigation. This structured approach to managing environmental impacts is embedded in several key legislative frameworks, including:

The Environmental Impact Assessment (EIA) Regulations (2017)

The Environment Act 2021

The National Planning Policy Framework (NPPF)

The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations)

Defra’s Biodiversity Metric and Biodiversity Net Gain Guidance

Failing to integrate this principle into the site selection methodology or process would be inconsistent with national policy and, therefore, unsound. Instead, alternative sites—identified as preferred in the Agenda for the 3rd September 2024 Strategic Planning Committee meeting—should be allocated in place of Exmo_20.

Full name: kirsty anne cross

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 listed as a reasonable alternative on page 329, based on the justification that all sites were assessed as suitable, available, and achievable in the HELAA. However, Exmo_20 was not actually deemed suitable. This indicates that Exmo_20 does not have the potential for development, and its inclusion is unjustified. It should be removed from the Local Plan. Instead, other sites, identified as preferred in the Agenda for the 3rd September 2024 Strategic Planning Committee meeting, should be considered for allocation as alternatives to Exmo_20.

Full name: Emily Glanfield

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.: PAGE 340 Of the Sustainability Appraisal Report refers to “Mitigation measures to address likely significant adverse effects and maximise beneficial effects; and likely post-mitigation effects”. It concludes that “for areas of Exmo_04 and Exmo_20 within 400m 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”. Exmo_20 was left unamended. This is totally inconsistent. For the plan to be sound and justified consistency must be applied and Exmo_20 amended accordingly, with the site allocation and settlement boundary being repositioned to below 400m from the Pebblebed Heaths “to exclude to the most sensitive area.” In the Exmouth Sites Biodiversity objective (p.331/332) both sites, Exmo_04 and Exmo_20 both score double negative. Whereas this results in Exmo_04 being only partially allocated to exclude the 400m proximity zone, the settlement boundary is extended to include the 400m proximity zone specifically to allow Exmo_20 to be allocated in its entirety. This complete inconsistency of application of the Biodiversity Objective is unjustified and makes allocation of Exmo_20 unsound. On page 343 of the Report the reason given for rejecting Exmo_04b is “due to major adverse biodiversity effect arising from its location within 400m Pebblebed Heaths exclusion zone’. For consistency across site allocations, thus making them justified and sound, the top 400m of Exmo_20 should be excluded “due to major adverse effect arising from its location within 400m Pebblebed Heaths exclusion zone”. Without this Exmo_20 should be removed from the Local Plan.

Full name: Emily Glanfield

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 objective 1 is to “conserve and enhance the habitat and wildlife of our natural environment”, ensuring “current, and potential future, habitat connectivity is not compromised.” Allocation of Exmo_20 is in direct conflict with these objectives; it is adjacent to the Pebblebed Heaths, (SAC/SPA/SSSI) and lies within an identified Strategic Nature Area (SNA 368) which forms a key part of Devon’s “Nature Recovery Network’ providing a wildlife corridor connecting the Heaths to the coast. In accordance with The Environment Act 2021 EDDC are a ‘supporting authority’ whose legal duty it is to ensure that the planning system and Local Nature Recovery Strategy dovetail and do not provide conflicting steers for the same piece of land. Exmo_20 is also a supporting site for Nightjars (listed as Annexe 1 in the Habitats Directive), for which the SPA is designated. Studies show that Nightjar fly up to 7km from nesting sites to feed at night and loss of foraging habitat or disruption to routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 contains many ancient, veteran and mature trees, considered ‘irreplaceable habitats’ due to the unique microhabitats they offer and their loss cannot be mitigated against. Other sites, shown as ‘preferred’ within the agenda for the Strategic Planning Committee meeting of 03.09.24 should have been allocated as an alternative to Exmo_20

Full name: Emily Glanfield

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 objective 1 is to “conserve and enhance the habitat and wildlife of our natural environment”, ensuring “current, and potential future, habitat connectivity is not compromised.” Allocation of Exmo_20 is in direct conflict with these objectives; it is adjacent to the Pebblebed Heaths, (SAC/SPA/SSSI) and lies within an identified Strategic Nature Area (SNA 368) which forms a key part of Devon’s “Nature Recovery Network’ providing a wildlife corridor connecting the Heaths to the coast. In accordance with The Environment Act 2021 EDDC are a ‘supporting authority’ whose legal duty it is to ensure that the planning system and Local Nature Recovery Strategy dovetail and do not provide conflicting steers for the same piece of land. Exmo_20 is also a supporting site for Nightjars (listed as Annexe 1 in the Habitats Directive), for which the SPA is designated. Studies show that Nightjar fly up to 7km from nesting sites to feed at night and loss of foraging habitat or disruption to routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 contains many ancient, veteran and mature trees, considered ‘irreplaceable habitats’ due to the unique microhabitats they offer and their loss cannot be mitigated against. Other sites, shown as ‘preferred’ within the agenda for the Strategic Planning Committee meeting of 03.09.24 should have been allocated as an alternative to Exmo_20

Full name: Emily Glanfield

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 Site Selection Methodology document which appears in the reg 19 Draft Local Plan evidence library is not the version which was used for the reg 18 stage; an amended version has been submitted to the evidence library - this methodology document was amended AFTER the SPC approved the Draft Local Plan on 11.12.24. Methodology was altered retrospectively to remove conflict within the Local Plan. Exmo_20 failed the HELAA assessment; it was deemed “available but not suitable or achievable”, therefore according to the methodology in use at the time Exmo_20 was unable to be selected, and was accordingly omitted from Stage 3 Site Assessments. AFTER the Draft Local Plan had been approved (with Exmo_20 having reappeared and been selected), wording of the site selection methodology was altered to enable sites which had failed site sifting at stage 2 to be carried forward to stage 3 “in exceptional circumstances”, and to state that “such cases will be clearly justified”. Note there is no agreed definition of what constitutes ‘exceptional circumstances’, nor is any ‘clear justification’ given. Furthermore, despite Exmo_20 having failed the HELAA assessment, sustainability Appraisal Report (Feb 2025) states that it was “assessed as suitable, available and achievable”. Neither the decision-making process nor the evidence base have been sufficiently transparent, robust or well documented for the process to be considered sound, nor does amending the evidence base retrospectively to fit the plan enable the process to be considered legally compliant. On these bases allocation of Exmo_20 cannot be considered justified or sound.

The Site Selection methodology used for the Regulation 18 stage states that “It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but if not, such sites should be sifted out at stage 2”.(Site Selection methodology May 22, Subtext point 6).

Exmo_20 was ruled out as being unsuitable in the HELAA, yet despite being within 400m of the Pebblebed Heaths appeared again at stage 4 and was allocated. AFTER the Draft Local Plan had been approved, the Site Selection methodology was amended and the above clause removed. The version of Site Selection Methodology presented in the evidence library of the Draft Local Plan is not the version used for reg 18 but a version amended to remove conflict within the plan. Neither the decision-making process nor the evidence base have been sufficiently transparent, robust or well documented for the process to be considered sound, nor does amending the evidence base

retrospectively to fit the plan enable the process to be considered legally compliant. On these bases allocation of Exmo_20 cannot be considered justified or sound.

Full name: Emily Glanfield

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 Local Plan (Paragraph 12.31) states that “The Council will consult statutory pollution control authorities at an early stage for proposals that may raise pollution concerns. This ensures that developments are assessed for their potential impacts on health, the natural environment and amenity.” Councillors allocated Exmo_20, a site adjoining a SAC/SPA/SSSI without consulting either statutory pollution control authorities or Natural England to consider pollution concerns.

Natural England’s ‘standing advice’, as a statutory consultee, given to LPAs is that

“You must consult Natural England if a development proposal: * might affect a site of special scientific interest (SSSI) * needs an environmental impact assessment * needs an appropriate assessment under the Habitats Regulations”

Natural England were not consulted on this site. The only engagement had with Natural England was when they were invited to comment on the whole of the draft Local Plan, at the point when Exmo_20 was a rejected site.

Exmo_20 was allocated and the Draft Local Plan agreed before the initial Habitats Regulations Assessment was published on 30.01.25. The HRA concluded 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)”. There is currently no suitable mitigation for this. As a result of failing to follow due process EDDC have allocated Exmo 20 against the principles of the mitigation hierarchy; to prioritise avoidance over mitigation. The allocation of Exmo_20 was not in accordance with the NPPF (chapter 3, paragraph 16c) which states “The right information is crucial to good decision-making, particularly where formal assessments are required (such as Habitats Regulations Assessments...)”. Councillors were simply not in possession of the right information when they voted on allocation of Exmo_20. They did not have the results of the Habitats Regulations Assessments. By the time they did, they had no opportunity to revisit their decision.

A member of the Strategic Planning Committee directly expressed her discomfort at the committee not having seen the Habitat Regulation Assessments (and other evidence). (SPC meeting 04.02.25, 1:15). She suggested that by not having access to these documents before the Local Plan going to regulation 19 consultation and without the information having gone through committee and been discussed, it raised the question of whether the Draft Local Plan could be considered Sound and Legally robust. The Habitats Regulations Assessments and other missing evidence was referred to by The Assistant Director – Planning Strategy and Development Management, as “bits and bobs”, and it was considered satisfactory go to regulation 19 consultation without them. THIS RENDERS THE ALLOCATION OF EXMO_20 IN DIRECT CONFLICT WITH NPPF AND THEREFORE UNSOUND.

In addition to this, also not in accordance with NPPF, (Chapter 3, paragraph 16c), members of the SPC did not have the right information in terms of site boundaries. The map shown to the SPC when they voted on sites was massively inaccurate and the boundary of Exmo_20 depicted approximately 1/3 more land than was available, including a substantial listed heritage site (St Johns in the Wilderness church and churchyard), a large area of SAC/SASI impact risk zone, and a considerable number of privately owned properties. Numerous attempts were made by members of the community to get the map amended to inform councillors of the actual land available but to no avail, until it appeared corrected in the reg. 19 Draft Local Plan. To make decisions based on misleading, incomplete and inaccurate information is inconsistent with national policy. And makes allocation of site Exmo_20 unsound.

Full name: Emily Glanfield

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 Site Selection Methodology and allocation process should have incorporated the Mitigation Hierarchy, prioritising avoidance over mitigation. Not to have done so is not in accordance with the National Planning Policy Framework(NPPF), The Environmental Impacts Assessment (EIA) Regulations 2017 nor The Conservation of Habitats and Species Regulations 2017. To have failed to implement this makes the site selection process undertaken by EDDC not sound. Exmo_20 should not have been allocated in preference to other sites shown as 'preferred' within the agenda for the Strategic Planning Committee meeting on 03.09.2024

Full name: Cynthia Goodyear

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.: Sd23 Otto 01

The allocation of housing, (10 proposed dwellings), would have a detrimental affect on the character of Otterton village and it's landscape. This site houses various wildlife species, notably bats and newts. It provides a natural habitat for birds and to build on it would effectively remove an important wildlife corridor. There are other less sensitive sites within the village boundary which should be considered.

Full name: Cynthia Goodyear

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.: Site allocation SD23 Otto 01. This land has been known to suffer erosion in the past. The burden of housing would seem inappropriate and unsustainable. Drainage and flooding onto nearby, lower positioned properties is a huge concern.

There are other sites around Otterton which would be more economic to develop and more sustainable for the future.

Full name: Nigel Humphrey

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 map on page 326 for site Exmo_20 is incorrect. Since being made aware of this site on 4th September 2024 my neighbours and I have repeatedly made EDDC aware that our homes, the Grade II* listed church and its lands, and the caravan park etc... ARE NOT TO BE INCLUDED AS PART OF THIS DEVELOPMENT, AND SHOULD NOT BE COVERED BY THE SHADED AREA ON THIS MAP. This has been raised with the Chair of the Strategic Planning Committee and planning officers (see email trail evidence attached showing contact with Councillor Todd Olive for an example). I was under the impression that all of this has been sorted and the map shown in Blue within the Reg 19 evidence should be the one used here (I have attached this for evidence) The map on page 326 needs to be replaced with the correct map. Please amend as a matter of urgency.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: HELAA Appendix E(v)1 Available sites - NOT suitable or achievable November 2022.pdf:

<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744381242/projects/6734d674023a1f95dd0a926c/respondent-upload/gjwbmi6orbd5d1akjosi.pdf>; Map showing Exmo_20 and boundaries.pdf:
<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744381247/projects/6734d674023a1f95dd0a926c/respondent-upload/xd3qonuvcxstaorwtfvp.pdf>; Email including map issues.pdf:
<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744381245/projects/6734d674023a1f95dd0a926c/respondent-upload/wwcfve6pvwkqqkfukxa0.pdf>; Main evidence and timeline Reg 18 to Reg 19.pdf:
<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744381243/projects/6734d674023a1f95dd0a926c/respondent-upload/bii9z7ndekvo9nq5uni3.pdf>

Full name: Nigel Humphrey

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 page 13, point 13. Connectivity and transport, is supposed to reduce reliance on car use, increase walking/cycling, not have an impact on the local road network, reduce congestion etc... None of this will be achieved by developing site Exmo_20. This site is on a steep slope from North to South, and the site will effectively be split into two by the access restrictions. The main access point this 'large' development is onto the already congested B3179 with known congestion issues. Residents will not walk for their main shops, doctors, dentists etc, and the main access point is over 4.2 miles from the town centre. Due to the site size, the majority of residents will also have to travel nearly 0.5 of a mile just to get to the main access point. This site is unsustainable and should be removed from the Draft Local Plan.

Full name: Nigel Humphrey

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 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.' The development of site Exmo_20 would not minimise the need to travel. It is in an unsustainable location with the main access point for between 700 to 1000 homes being via the B3179 at the top of the site, and with Exmouth town centre over 4.2 miles away from this access point. Allocation of this site 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.

Full name: Nigel Humphrey

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.: This sustainability Appraisal Report seems to be in conflict with the November 2022 Sustainability Appraisal Report in relation to sites Exmo_20 and Exmo_46. See pages 251 to 268 and specifically page 253 of the November 2022 report. The following information also need to be taken into account.

Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022, and therefore not available to be consulted on at Reg 18. The only site associated with Exmo_20 and deemed suitable as 'second choice', was Exmo_46. This site should have been the only one going through to Reg 18. However, for some unexplained reason, this site has been ignored. The validity of Exmo_46 can be confirmed by checking the relevant KEY supporting evidence documents for the Reg 18 consultation, which are the HELAA Report, The Sustainability Appraisal Report and the 'Exmouth sites - additional information' document. The fact that two NEW sites Exmo_20a and Exmo_20b, suddenly appear on maps at the Strategic Planning Committee meeting on the 1st November 2022 is questionable (see the evidence titled 'New sites evidence' with email trail dated 20/03/2025). It is to be noted that these two NEW sites are not mentioned or discussed at this meeting (I have watched the youtube video of the meeting and went through the minutes and documents for this meeting). This is six days before Reg 18 starts, and more importantly these two NEW sites are not mentioned in any of the three KEY evidence reports/documents mentioned above. Taking all of the above into account, the sites Exmo_20a, Exmo_20b and Exmo_20 have no valid reason for being in Reg 18, and therefore should not have been discussed on the 3rd September 2024, which ultimately means that Exmo_20 cannot be put through for Reg 19 consultation. Please see evidence that has been provided alongside this submission. FOR THE — Site Selection Methodology (dated May 2022), the HELAA Report (November 2022), the Sustainability Appraisal Report (dated November 2022) and the 'Exmouth sites - additional information' document, these can be found on the EDDC website.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: Main evidence and timeline Reg 18 to Reg 19.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743322857/projects/6734d674023a1f95dd0a926c/respondent-upload/jm1hmywda8h8wkmq7o9c.pdf>; New sites evidence.pdf: <https://res.cloudinary.com/commonplace-digital->

limited/image/upload/v1743322857/projects/6734d674023a1f95dd0a926c/respondent
-upload/pxu9gqqursybrzt9lhaf.pdf

Full name: Nigel Humphrey

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 pages 450, 502, 587, and 594, it states that ‘The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA’. The list it refers to is of the sites for Beer, Fenton, Westclyst, and West Hill. It should be noted that sites Beer_01, Feni_13, Feni_14, Feni_15, GH/ED/38, Polt_07, West_14, and West_20 are on the HELAA Appendix E(v)1 - Available housing sites - Not suitable or achievable list. WHICH DOCUMENT IS CORRECT?? I was under the impression that as the HELAA was produced in November 2022 that the February 2025 Sustainability Appraisal Report would have checked this sort of detail before making such a claim. See attached copy of HELAA appendix, or go to EDDC evidence library for Reg 19.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: HELAA Appendix E(v)1 Available sites - NOT suitable or achievable November 2022.pdf:

<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743292466/projects/6734d674023a1f95dd0a926c/respondent-upload/lbiuschwfc6mfujzs45.pdf>

Full name: Nigel Humphrey

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 page 406 it states that ‘The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA’. The list it refers to is of the sites for Broadclyst. It should be noted that site Brcl_29 is on the HELAA Appendix E(v)1 - Available housing sites - Not suitable or achievable list. WHICH DOCUMENT IS CORRECT?? I was under the impression that as the HELAA was produced in November 2022 that the February 2025 Sustainability Appraisal Report would have checked this sort of detail before making such a claim. See attached copy of HELAA appendix, or go to EDDC evidence library for Reg 19.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: HELAA Appendix E(v)1 Available sites - NOT suitable or achievable November 2022.pdf:

<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743291354/projects/6734d674023a1f95dd0a926c/respondent-upload/lx4pp2tpdsaw87woqmh8.pdf>

Full name: Nigel Humphrey

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 page 394 it states that ‘The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA’. The list it refers to is of the sites for Sidmouth. It should be noted that site Sidm_29 is on the HELAA Appendix E(v)1 - Available housing sites - Not suitable or achievable list. WHICH DOCUMENT IS CORRECT?? I was under the impression that as the HELAA was produced in November 2022 that the February 2025 Sustainability Appraisal Report would have checked this sort of detail before making such a claim. See attached copy of HELAA appendix, or go to EDDC evidence library for Reg 19.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: HELAA Appendix E(v)1 Available sites - NOT suitable or achievable November 2022.pdf:
<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743291163/projects/6734d674023a1f95dd0a926c/respondent-upload/t1bbfkzqp6g3seu8m8bx.pdf>

Full name: Nigel Humphrey

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 page 357 it states that ‘The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA’. The list it refers to is of the sites for Honiton. It should be noted that site GH/ED/39 is on the HELAA Appendix E(v)1 - Available housing sites - Not suitable or achievable. WHICH DOCUMENT IS CORRECT?? I was under the impression that as the HELAA was produced in November 2022 that the February 2025 Sustainability Appraisal Report would have checked this sort of detail before making such a claim. See attached copy of HELAA appendix, or go to EDDC evidence library for Reg 19.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: HELAA Appendix E(v)1 Available sites - NOT suitable or achievable November 2022.pdf:
<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743290620/projects/6734d674023a1f95dd0a926c/respondent-upload/fmt7inewzrcp5n0xla81.pdf>

Full name: Nigel Humphrey

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 page 346 it states that ‘The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA’. The list it refers to is of the sites for Axminster. It should be noted that Axmi_10 is on the HELAA Appendix E(v)1 - Available housing sites - Not suitable or achievable. WHICH DOCUMENT IS CORRECT?? I was under the impression that as the HELAA was produced in November 2022 that the February 2025 Sustainability Appraisal Report would have checked this sort of detail before making such a claim. See attached copy of HELAA appendix, or go to EDDC evidence library for Reg 19.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: HELAA Appendix E(v)1 Available sites - NOT suitable or achievable November 2022.pdf:
<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743289859/projects/6734d674023a1f95dd0a926c/respondent-upload/ann5ylsrfpraoublzo4o.pdf>

Full name: Nigel Humphrey

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.:

At the top of page 329 it states that ‘The reasonable alternatives listed above have all been assessed as suitable, available and achievable in the HELAA’. The list it refers to is on page 328. Of the sites listed here for Exmouth, sites Exmo_03, Exmo_08, Exmo_20, Exmo_47 and Lymp_10 are all on the HELAA Appendix E(v)1 - Available housing sites - Not suitable or achievable. WHICH DOCUMENT IS CORRECT?? I was under the impression that as the HELAA was produced in November 2022 that the February 2025 Sustainability Appraisal Report would have checked this sort of detail before making such a claim. See attached copy of HELAA appendix, or go to EDDC evidence library for Reg 19.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: HELAA Appendix E(v)1 Available sites - NOT suitable or achievable November 2022.pdf:

<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743288979/projects/6734d674023a1f95dd0a926c/respondent-upload/feeu5l7osb3lh5k4mfd.pdf>

Full name: Nigel Humphrey

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.: Why is it that after numerous conversations relating to the fact that the map for site Exmo_20 is incorrect. That the map on page 326 is still showing the old outline? My neighbours and I have been highlighting this since we were made aware of this site on 4th September 2024. This map should not be used. Our homes, the church the caravan site etc..... ARE NOT PART OF THIS DEVELOPMENT. It is rather infuriating that this map is still being used. Please replace with correct version! I attach an email trail highlighting issues with the map - see responses from Councillor Todd Olive.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: Email including map issues.pdf:
<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743288137/projects/6734d674023a1f95dd0a926c/respondent-upload/gefrgnbfmy3jxvkoacr.pdf>

Full name: Mrs Margaret Elms

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.: This seems to be a thorough appraisal of the area.

Full name: Mr John Hamill

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.: Page 328:- Exmo_20 is on the reasonable alternatives list on p.328, with the justification that all the sites were assessed as suitable, available and achievable in the HELAA, Exmo_20 was in fact not. This provides evidence that Exmo_20 does not have potential to be delivered, its inclusion is unjustified and must be omitted 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.

Full name: Mr John Hamill

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 map shown on p326 for allocated site Exmo_20 is not correctly drawn. Since the erroneous allocation of this site on 3/9/2024 I and many other people have attempted to get EDDC to listen (With absolutely no success) and to accept the fact that the map includes many private homes, the Grade 11* listed St John's in the Wilderness church, graveyard and grounds together with the Caravan Park. None of this land is available for development, EDDC Officers have misled Councillors by stating that it is and therefore Councillors have voted incorrectly for Allocation. This failing has been raised with Planning Officers and the Chair of the Strategic Planning Committee on numerous occasions but none of them has made any effort to correct this. The result is that Exmo_20 has not qualified for Allocation and therefore should be removed from the Plan. In addition p 329 states "The reasonable alternatives listed above have all been assessed (it doesn't say by whom) as "suitable", "available" and "achievable" in the HELAA. Of the Exmouth sites listed Exmo_03, Exmo_08, Exmo_20, Exmo_47 and Lymp_10 are all on the HELAA Appendix E (v) 1 - Available housing sites - NOT Suitable or Achievable. Clearly on this basis none of these sites should have been Allocated. The HELAA was prepared in November 2022 and the sustainability Appraisal report in February 2025, clearly those producing the 2025 document hadn't even bothered to check the 2022 before making this claim. The evidence of this is in the EDDC Evidence Library for the current Consultation. Furthermore p 357 states "The reasonable alternatives listed above have all been assessed as "suitable, available and achievable" in the HELAA. The list it refers to is of the sites for Honiton, it should be noted that site GH/ED/39 is on the HELAA Appendix E (v)1 - Available housing sites - NOT Suitable or Achievable. As above the HELAA report was produced in November 2022 and the Sustainability Appraisal Report in February 2025 - see EDDC Evidence Library for the 2025 Regulation 19 Consultation. The same as above applies on p394 Sidm_29, comments above about HELAA, the SAR and the Evidence Library apply. The same as above applies on p 406, Brcl_29, comments above about HELAA, the SAR and the Evidence Library apply. Similarly pp 450,502,587 & 594 referring to sites in Beer, Feniton, Westclyst & West Hill, comments above about HELAA, the SAR and the Evidence Library all apply. In addition the February 2025 SAR is in conflict with the November 2022 SAR in relation to Allocated Sites Exmo_20 & Exmo_46. See pp251 - 268 and specifically p253 of the November 2022 Report in particular Exmo_20 was deemed available BUT NOT "Achievable or Suitable" in the November 2022 HELAA and therefore ineligible for Consultation at Reg 18. The only site associated with Exmo_20 but only deemed suitable as a second choice was Exmo_46 and therefore this was the only site that could possibly be considered at Reg 18 stage. For totally inexplicable reasons

Exmo_46 was completely ignored. The validity of Exmo_46 can be seen by referring to Evidence documents for the Reg 18 Consultation ie the relevant HELAA, SAR and the "Exmouth Sites - additional sites" document. Completely incorrectly two new sites were created by EDDC Exmo_20a & 20b and appeared on maps produced to the Strategic Planning Committee in 1/11 2022, it has not been possible to find out from EDDC who created Exmo_20a & 20b, under which authority or why. From the minutes of this meeting (available on EDDC website) no discussion was held on these newly created entities, although the Reg 18 Consultation started just 6 days later. Therefore it is patently obvious that there is no legitimate reason for Exmo_20, Exmo_20a or Exmo_20b to be included in the Reg 18 and therefore no legitimacy for their inclusion in the SPC meeting of 3/9/2024 when they were incorrectly Allocated. By following this evidence and logic Exmo_20 is incapable of being included in the Reg 19 Consultation. Additionally it is stated in pp11/12 that "4. Climate change and carbon emmisions . (Encourage) Development that minimises the need to travel by providing access to public transport and cycleways. Exmo_20 is in direct and specific opposition to this policy as the main access to the site for 700 + houses is away from Exmouth via the B3179, more than 7 km from Exmouth centre. The town centre of Budleigh Salterton is 3km fro the site access point, this site is in effect an alloactaion to a tier 3 settlement. Lastly p13 point 13 - Connectivity and Transport the policy requires a reduced reliance on car use and an increased take up of cycling and walking together with having no impact on local raod networks thus reducing congestion. Exmo_20 is a direct rejection of these policies, the main access will be onto the B3179 (see above) Walking and cycling are not feasible due to the steepness of the site and the fact B3179 is already overcrowded and dangerous. To conclude it is obvious that Exmo_20 was never qualified for inclusion in this Consultation and is strictly in conflict with many of the policies that EDDC claim to promote, for these reason Exmo_20 should be removed from the Development Plan and some of the other more suitable rejected sites be brought forward..

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

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.

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.

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.

Full name: Billy Reed

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 page 340 of the Exmouth Sites connectivity and transport commentary it states that Exmouth is within 800m of A376 which is not true. Also incorrect is the use of a figure of 1,600m rather than 800m in the Exmouth Sites access to services commentary on page 338. 1600m refers to total trip distance, there and back. 800m is the distance which should have been cited in as a walkable distance according to the Government's National Design Guide. Using the 1600m is unjustified and misleading to those reading through Local Plan. Distances should be taken from central points of sites. Exmo_20 is a vast site stretching over a long distance top to bottom. It is crucial that the central point is used for distance measurements rather the nearest points. Distance measurement is used innacurately and in a misleading way several times with reference to Exmo_20 in the Local Plan, making it unjustified and unsound. The site access point is at the most northern point of Exmo_20; having used distances from the most southern parts - on a site approx 800m long, makes a material difference to the proposal and makes the allocation of Exmo_ unjustified and unsound.

Full name: Helen Mary Roulson

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.: Please can we consider rain water collection for new builds to be used in toilet flushing. Also instead of tarmac or concrete drives, please use water permeable surfaces to reduce run off and flash flooding.

Full name: Thomas Shillitoe

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.”

Why is it only Exmo_04 that can be amended? It’s inconsistent and therefore not justified. The site allocation and the settlement boundary must be repositioned 400 metres from the Pebblebed Heaths.

On page 342 Exmo_20 is listed as a preferred alternative for Exmouth, yet as it failed HELAA 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 must be repositioned 400 metres from the Pebblebed Heaths.

Full name: Thomas Shillitoe

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. Nor is it mentioned that this large greenfield 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, that the Brook runs through the centre of the largest settlement in East Devon, and the substantial size of the proposed Exmo_20 allocation upstream, this is unjustified.

In the Exmouth Sites access to services commentary (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, 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. Using the 1,600 metre figure is unjustified.

In the Exmouth Sites connectivity and transport commentary (p.340), It is claimed that Exmo_20 is within 800m of the A376, this is not true, therefore unjustified. Also of note is that 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.

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: Thomas Shillitoe

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 Biodiversity objective on (p.331/332), two sites, Exmo_04 and Exmo_20 score double negative (--). The commentary and conclusions between the two sites are inconsistent and unjustified. Exmo_04 results in part allocation outside of the 400m yet Exmo_20's allocation runs right up to be adjacent to the protected site.

In the Exmouth Sites Hist. built env. commentary (p.334), the large size of the site is assumed to enable the adverse impacts to have a minor negative effect. Firstly the site has significantly shrunk since the ownership was actually checked after allocation on 3rd September 2024, secondly the top 400m of the site cannot accommodate housing and thirdly it is the size required to accommodate 700 houses, therefore I do not believe an assumption that mitigation can be incorporated is sufficient justification.

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.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: Sustran walkable-neighbourhoods.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743212983/projects/6734d674023a1f95dd0a926c/respondent-upload/jksvegsejufdq6g5k5qt.pdf>

Full name: Thomas Shillitoe

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 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 being deemed “not suitable or achievable” (HELAA Appendix E(v)1). Its allocation is unjustified. 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.

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).: appendix-e-v-1-available-not-suitable-or-achievable-housing-sites.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1743211873/projects/6734d674023a1f95dd0a926c/respondent-upload/qf7mynx6kedotcqu7mj.pdf>

Full name: Thomas Shillitoe

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 “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 contrary to this, furthermore 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 allocation 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 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 with the main site access point now out onto the B3179 country road. Allocation of this site is unjustified. 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: Thomas Shillitoe

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 is the structured approach to managing environmental impacts embedded in several key pieces of legislation. Some of the most relevant include:

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 To not implement this in the site selection methodology or process is not consistent with national policy and therefore not sound. 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: Martyn Smith

Other party name (if relevant): Feniton Parish Council

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.:

Flawed Sustainability Appraisal The Sustainability Appraisal includes a lengthy section on the sites that emerged from the Call for Sites. A member of the Parish Council's Local Plan Working Group made detailed comments on the original appraisal of the Feniton sites which have never been acknowledged or reported to the Strategic Planning Committee. No changes have been made to the Sustainability Appraisal and no explanation given as to why the suggested amendments were rejected. The Parish Council remains concerned that this element of the Sustainability Appraisal is flawed and understates the sustainability impacts of development proposals in Feniton.

Full name: Barrie Thomas

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.: Objection 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.” Why is it only Exmo_04 that can be amended? It’s inconsistent and therefore not justified. The site allocation and the settlement boundary must be repositioned 400 metres from the Pebblebed Heaths. On page 342 Exmo_20 is listed as a preferred alternative for Exmouth, yet as it failed HELAA 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 on these grounds consequently 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 again is inconsistent with the Exmo_20 allocation is not justified and accordingly not sound. The site allocation and the settlement boundary must be repositioned 400 metres from the Pebblebeds Heath.

Full name: Barrie Thomas

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.:

Objection 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. Nor is it mentioned that this large greenfield 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, that the Brook runs through the centre of the largest settlement in East Devon, and the substantial size of the proposed Exmo_20 allocation upstream, this is unjustified. In the Exmouth Sites access to services commentary (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, 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. Using the 1,600 metre figure is unjustified. In the Exmouth Sites connectivity and transport commentary (p.340), It is claimed that Exmo_20 is within 800m of the A376, this is not true (over 2 miles), therefore unjustified. Also of note is that 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. 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: Barrie Thomas

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.:

Objection In the Exmouth Sites Biodiversity objective on (p.331/332), two sites, Exmo_04 and Exmo_20 score double negative (--). The commentary and conclusions between the two sites are inconsistent and unjustified. Exmo_04 results in part allocation outside of the 400m yet Exmo_20's allocation runs right up to be adjacent to the protected site. In the Exmouth Sites Hist. built env. commentary (p.334), the large size of the site is assumed to enable the adverse impacts to have a minor negative effect. Firstly the site has significantly shrunk since the ownership was actually checked after allocation on 3rd September 2024, secondly the top 400m of the site cannot accommodate housing and thirdly it is the size required to accommodate 700 houses, therefore I do not believe an assumption that mitigation can be incorporated is sufficient justification. 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.

Full name: Barrie Thomas

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.: Objection Figure 2.2 (p.11) states “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 contrary to this, furthermore 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 allocation 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 with the main site access point now out onto the B3179 country road. Allocation of this site is unjustified. 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 being deemed “not suitable or achievable” (HELAA Appendix E(v)1). Its allocation is unjustified. 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: Barrie Thomas

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.:

Objection 2 The Sustainability Appraisal Framework should make reference to the Mitigation Hierarchy which prioritises avoidance over mitigation. This is the structured approach to managing environmental impacts embedded in several key pieces of legislation. Some of the most relevant include:

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 To implement this in the site selection methodology or process is not consistent with national policy and therefore not sound. 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: Barrie Thomas

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.:

Objection 1 Exmo_20 is on the reasonable alternatives list (p.328), with the justification that all the sites were assessed as suitable, available and achievable in the HELAA, Exmo_20 was not. With this evidence it is clear that Exmo_20 plan does not have the capability of being achievable, its inclusion is unjustified and must be omitted. 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: Martin Thurgood

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.:

SUSTAINABILITY APPRAISAL – NON-TECHNICAL SUMMARY PARAGRAPH 34. –

CURRENT TEXT IS AS FOLLOWS: Sites at the larger settlements generally have positive effects on transport connectivity, access to services, town centres, and carbon

emissions, as there are greater opportunities for sustainable travel and minimising the need to travel to jobs and facilities. Such opportunities are less at the smaller settlements, but the scale of development is more limited, so positive effects remain.

COMMENT: There appears nothing in the draft plan to support this assertion and its delivery. To advance Ottery St Mary as an example, there are currently no sustainable travel options that mitigate against the use of private cars: and there is nothing in the draft local plan to address the matter. Ottery St Mary has no fast link to the principal employment sites of Exeter, the airport and its related employment sites. There is no rail station and bus services are infrequent and very slow: but there is no draft policy or other proposal in the draft plan to address the point such as regular limited stop bus services to key employment locations and other major East Devon towns. (Similar issues no doubt arise at other larger settlements). On a smaller scale, there are no proposals in the draft local plan to eliminate shorter journeys by motor vehicles to and from the existing larger settlements. Again, to take Ottery St Mary as an example, there are no safe pedestrian and cycle links between the town centre and the smaller outlying settlements (Alfington, West Hill, Tipton St John, Wiggaton, etc) served by the Town's facilities (and, in the case of Ottery St Mary, a failure to address an essential safe link between the Town and the major employment and retail hub at the garden centre). The current narrow country lanes are considered by the overwhelming majority of people as unsafe for walking and cycling: but the draft local plan fails to address the matter. A policy of providing segregated pedestrian and cycle routes to address such matters is essential, not least on grounds of safety, 'Zero Emissions' and the promotion of thriving service centres in the smaller towns. (Such provision will also address the travel needs of an aging population as more mechanised disability vehicles come into use). To identify edge of development housing sites but fail to identify how sustainable travel will be secured is unacceptable and must be addressed if a case is to be made out for such developments.

PARAGRAPH 48. – CURRENT TEXT IS AS FOLLOWS: How can mitigation measures reduce the adverse effects of the Local Plan? 48. The SA report notes the mitigation measures that can be applied to the policies and sites to reduce any adverse effects; and where those measures have been incorporated into the Local Plan. Mitigation

measures will vary depending on the specific characteristics of each site, but some general mitigation measures include:

- Enhance sustainable travel links such as creating bus stops and pedestrian and cycle links within the site and off-site. COMMENT: Your proposed development maps do not show pedestrian and cycle links off-site: while such provision is clearly essential, a failure to indicate where such might be located simply fails to address the impossibility of its provision, as is clearly demonstrated by your proposals for Ottery St Mary and the Town's recent past experience. (No doubt the same can be said for other existing larger Towns). The matter must be positively and practically addressed in the Local Plan: it is not sufficient merely to raise the point but not address its resolution.

- Provide a mix of uses on-site, such as community facilities, employment land, open space and play space, and sustainable travel links – this is more realistic for large-scale sites. COMMENT: The statement is correct and highlights a major deficiency in the draft plan, that is, the provision of increased community facilities at the smaller towns where significant development is proposed. To advance Ottery St Mary as an example, the Town has experienced some 25% growth in dwellings in recent years (against a planned expansion of around 8%) but no additional community facilities have been provided. A further significant increase is proposed in the draft local plan but no increase in community facilities (other than schooling) has been identified and no land has been allocated for such use. (No doubt the same can be said for other larger towns). Simply to identify and provide for housing needs is unacceptable without also identifying how increased community facilities (for example, public transport, health and recreation, etc) can and will be provided.

PARAGRAPH 50. – CURRENT TEXT IS AS FOLLOWS: A range of alternatives have been considered for the topic-based policies and sites in the Local Plan. For the Spatial Strategy, alternatives on the distribution of development are to concentrate development at the existing settlements, with no further large-scale development at the West End; more development at villages; development at existing settlements but focus strategic development at the West End with either a new town or several smaller new villages. The preferred option is to promote development [A] at existing settlements where there is a range of jobs, services, and facilities; whilst also focussing development where there is good connectivity in close proximity to a much wider range of jobs, services, and facilities in the West End and Exeter. [B] The scale of development proposed in the new town offers the greatest potential for a mix of uses, reducing the need to travel and providing opportunities sustainable travel links, which provides

better accessibility and reduced carbon emissions. COMMENT: The text at [A] makes an assertion that is not supported by the fact. To give but one example, Ottery St Mary has limited jobs and most people commute to Exeter by unsustainable means, services (such as health and etc) are stretched to beyond capacity and facilities (such as parking spaces, recreational land and the like) are limited. Crucially, the draft plan proposal does not make out the case for the ‘preferred option’ that it selects, that is development at existing settlements with the remainder provided in the West End and Exeter. Indeed, by stating that focusing development where there is good connectivity in close proximity to a much wider range of jobs, services, and facilities in the West End and Exeter, the draft Local Plan overwhelmingly makes the case for the option of focusing development almost wholly in the West End and Exeter and not the existing settlements. The text at [B] simply supports and reinforces the point that development close to Exeter and in the West End is the overwhelmingly logical choice: and that development at existing larger settlements is second best and fails to address the crucial issues that now face us, not least the climate emergency, Zero carbon, and the like.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

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.:

3. Sustainability Appraisal Overall, the Sustainability Appraisal (SA) provides a thorough assessment of the plan's environmental, social, and economic implications, and we welcome its generally positive findings. However, we urge further consideration of several key issues to strengthen the Plan's alignment with sustainability objectives. **Balancing Development and Sustainability** While the SA acknowledges the challenges of reconciling growth with environmental protection, we agree that many negative impacts can be mitigated through robust policy wording, embedded environmental enhancements, and well-designed green/blue corridors and connected ecological networks. However, where adverse effects are identified—particularly regarding biodiversity, water management, and climate resilience—we recommend explicit policy expansions or additions to ensure mandatory mitigation, compensation, or avoidance measures. **Biodiversity and Habitat Protection** The SA rightly highlights risks of habitat loss, species disturbance, and severance due to development, particularly on greenfield sites. To address this, policies must unambiguously enforce the mitigation hierarchy and Biodiversity Net Gain (BNG) requirements, ensuring development:

- Protects and incorporates existing habitats,
- Actively expands ecological networks through green corridors, sustainable land-use practices, and habitat restoration,
- Proceeds only where mitigation strategies demonstrably offset residual harm. We strongly advocate for site-specific biodiversity evaluations to be conditional on approved mitigation plans, with a focus on enhancing degraded areas through green infrastructure. **Water Quality and Infrastructure** The SA's limited focus on water quality, sewage capacity, and flood risk is concerning and we refer you to sections 1, 4 and 5 of this letter for related comments. A catchment-based approach to water management should be prioritised, with policies that:
 - Require proof of sewage infrastructure adequacy prior to development approval (i.e. written confirmation from the water undertaker that confirms the adequacy of sewage infrastructure prior to development),
 - Mandate sustainable drainage systems (SuDS), rainwater harvesting, and greywater recycling,

- Address flood risk through resilient design and strategic planning. Given the SA’s note of uncertainty around sewage treatment capacity, policies must explicitly tie development phasing to infrastructure delivery to prevent negative impacts on controlled waters resources. Climate Change and Emissions Reduction We support the SA’s emphasis on low-carbon development, energy efficiency, and sustainable transport. Policies should:

- Exceed minimum standards for renewable energy and carbon-neutral construction,
- Prioritise walking, cycling, and public transport to reduce reliance on private vehicles,
- Integrate climate adaptation measures (e.g., green roofs, flood-resilient design) into all developments. Holistic Policy Benefits While minor negative impacts of growth are noted, the SA rightly underscores the broader positive outcomes—environmental, economic, and social—that well-designed policies can deliver. These co-benefits should be central to decision-making, ensuring net gains for sustainability. Future Recommendations To enhance the SA’s effectiveness, we suggest:

- Regular monitoring of policy implementation, with adaptive management to address emerging challenges.
- Clearer linkages between SA findings and policy drafting to ensure mitigation is enforceable. In summary, we encourage your authority to refine policies to explicitly address biodiversity, water, and climate risks while capitalising on the SA’s positive framework. By doing so, the Local Plan can achieve truly sustainable development for East Devon.

Full name: Mr Simon Croft

Organisation (where relevant): South West Water

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.:

Water Resources – South West Water (SWW) supports the water resources section of the SA as the information regarding SWW’s DWMP is accurate and supports the statement: - South West Water’s Water Resource Management Plan concludes that there is sufficient water supply up to the year 2045. It states that groundwater provides most of the water supply for East Devon. In line with the East Devon Abstraction Licensing Strategy and Water Abstraction Plan 2017, the increased demand for water supply and associated infrastructure requirements from new development should be considered. As part of developing the DWMP & WRMP, SWW considered and factored in proposed levels of growth. SWW has now accepted OFWATs determination of the PR24 Business Plan, securing operational funding for the 2025 – 2030 period.