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George Boyd and Susan Abbott

Full name: George Boyd and Susan Abbott

Proposal:

5. Development in the Towns and Villages

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

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

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

PROPOSED NEW HOUSING SCHEME AT ST JOHNS ROAD ExMO 20a120b ST JOHNS I had written to you on 6 October 2024 detailing my objections to the above plan but you explained that my letter was too early to be considered. I have tried to lodge my objections using the "commonplace" online method only to be repeatedly refused on the basis that my confirmation code submitted was incorrect. Why I need a confirmation code is beyond me and I can only guess you are trying to make the process of lodging an objection as difficult as possible. Therefore I am updating my original letter setting out our worries about your plans and I hope that you will be able to pass this onto the appropriate officer dealing with the objections to your proposed scheme. I am writing to object to the above proposal which includes the changing of the lane from our home, Bystock Stables, leading up to St Johns Road, into a Cycle Path. We purchased our home in 1998, the property having been empty and unused since 1986 was derelict at the time. We had the property largely rebuilt and extended to provide suitable accommodation for myself and my wife as we are permanently disabled as a result of spinal injuries and both of us are full-time wheelchair users. The narrow lane that leads up from our home onto St Johns Road is well in excess of 100 metres and is owned by Eagle Investments but has only one passing point, which was installed by us at the insistence of EDDC and is at the top of the lane opposite Owls Cottage. The lane itself was tarmacked by the owner some years ago and we paid half of the costs to him which amounted to £5,000 at the time. The lane is used daily by me and my wife as we each own and drive adapted vehicles, we also use the lane to get to the road when using our electric wheelchairs which is quite often. The access to our home is used on a regular basis by Royal Mail and sundry other delivery vans/cars, also by our home help and care visitors on a weekly basis. The chemist and community nurses on a regular basis as and when required, tankers from Southern Fuels to deliver oil and Spirebourne to empty and maintain our septic tank, because of access both have to ensure that they do not send their large tankers and we also have other sundry visitors plus friends and family throughout the year. We are surrounded by fields and woods but due to our

circumstances we are unable to reach the road across the fields or through the woods and our only option to leave our home is via the lane. Therefore, in view of the above, we hope that the change of our lane to a Cycle Path will not be granted and we can continue to enjoy full use of the lane.

Cathy Adams

Full name: Cathy Adams

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Emo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

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

Full name: Cathy Adams

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY 0L05 of the Local Plan.

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

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

G.J .Adams

Full name: G.J .Adams

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo _20 would have adverse effects on Woodbury & Bickton common, it's also in conflict with Policy ARO1B .Too much building already through Marley towards the common. I remember the flooding in the 1960s ,recently (within the last 5 years) i have seen the withy brook almost over the bridge in Bradham lane .Goodmoor farm development already causing water level rises. Spring tide & heavy rain, I dread to think about the consequences.

John Adamson

Full name: John Adamson

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I would like to add the following comments to my previous objection on this matter.

The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers.

In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrook, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton.

Allocation Reference Gitti_03 and Gitti_04

I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for more than 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be

unsurmountable. If the site cannot come forward within the plan period for development, then it should not be allocated.

- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development.
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village.
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation.
- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting.
- This employment allocation of 14.6ha is significantly more than what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha.
- Any viability concerns must not be an over-riding justification for bad planning.

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- The “local need” for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark.
- The development would result in the unnecessary loss of high quality, productive agricultural land.
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road.
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment.
- The biodiversity qualities of the existing landscape will be seriously compromised.
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH – RESIDENTIAL

I OBJECT to the proposed allocation Gitti_05.

The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria.
- The detrimental impact development will have on the setting of Gittisham Village and its conservation area.
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the National Landscape.
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.
- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will also be detrimental to vehicular and pedestrian safety.
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to remain so.

- Highways, sewers, sewage treatment and surface water infrastructure are already at capacity.
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors' surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria recommend no greater distance than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is poor.
- The development would result in the unnecessary loss of high quality, productive agricultural land, which has already been ravaged by the development of the Hayne Lane estate.
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment.
- The biodiversity qualities of the existing landscape will be seriously compromised.

- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- There is a lack of provision of any accessible community facilities to serve this isolated community, a need which cannot be overcome, either in the short, medium or even long term.
- This development amounts to the rape of our countryside for purely monetary gain and has nothing to do with satisfying the housing needs of the community of Honiton.

robert agar

Full name: robert agar

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I do not fully understand the question but I oppose the development exmo-20

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I do not understand this question

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

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

Exmo-20 seems totally out of proportion to the area and being so close to the peopled common seems reckless to say the least. I have lived in exmouth for 40 years but gave up cycling on the main roads 20 years ago because of car drivers passing you at 50 miles an hour plus inches from your handlebars, I continue to ride off road and on the excellent cycle paths but now consider road cycling a suicidal pastime and the extra traffic 700 new houses would provide would make this much worse. The roads leading to this area seem to have been built in the 1920s at a guess and are totally inadequate for the volume of modern traffic, the large earth moving trucks from the goodmoore farm development are eroding the fragile roads to near farm track quality. If 700 new houses are built this provides extra strain on doctors schools and services are stretched super thin so I feel there is no benefit to community so I oppose this development strongly.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I only knew of this one week before the closing date so more notification to cooperate would be good

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Information be it by email or in person

Fran Aggleton

Full name: Fran Aggleton

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

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

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: I would like to question the ethics of the council when publishing this policy under the heading 'West End'. 'West End' is not the name of the area. The name of the area on my postal address is Tithebarn. 'West End' is not listed on the Ordinance Survey map, Google Maps or any other maps except the scribbled area of the PDF on this site. 'West End' is not the name of the Parish. All other areas listed in this consultation are listed under a recognisable name, and this one is not. Many people locally believe that the area in question is actually part of Pinhoe and are unaware this area is even part of East Devon's remit. I believe this will mean that this consultation will not actually reach an appropriate number of people living in Pinhoe, Monkerton or Tithebarn. I have also heard that the decision making team within EDDC likes to abbreviate West End of East Devon to WEEDs. Which is derogatory and disrespectful to everyone of the people living here. There are currently over 1000 properties in Tithebarn and I do not believe they are being considered equitably compared to other areas of the district. This is evidenced in the lack of resources provided to the area, from provision waste and dog bins, road signage and street cleaning to schools and indoor community spaces.

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

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: See my previous comments with regard to naming the area ‘West end’

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See my previous comments with regard to naming the area ‘west end’

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See my previous comments with regard to naming the area ‘west end’

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.: See my previous comments. EDDC has a systematic inequality in its approach in its duty of care compared to the rest of the District

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See my previous comments

Sarah Allen

Full name: Sarah Allen

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the land in Exmouth named Exmo_17. Until recently it was protected against building and hundreds of Exmouth residents said this shouldn't be removed. We are in a climate and ecological crisis and should not be using greenfield sites particularly those that in the past have been deemed coastal protection areas, so surely still need to remain as they are.

The access road is proposed to go across the popular foot and cycle path connecting Exmouth to Budleigh. This type of active way of travelling is essential to reduce carbon emissions. I believe that this road and the housing will have a negative impact on people who wish to use the area and the path for travel, exercise and their mental health.

Mike Allen

Full name: Mike Allen

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

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

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Housing for all stages of life (Policies HN01, HN03 and Policy HN04 The EDDC draft Local Plan (LP) and the NPPF focus on the diverse needs for housing in the population. The draft Local Plan recommendation is that developers focus on homes with 3-4 bedrooms. I believe this to be an inadequate, simplistic, policy target. Our Local Plan (LP) and our Corporate Plan must serve the diverse needs of the local population and must be the basis of our decisions about Housing and Economic Development. All NPPF revisions since 2018 have laid greater stress on the need for different types of homes for different types of people and a need to take account of demographic trends Policy HN01 (Meeting housing needs) summarises a list of needs, which I fully support, but then only focuses on tenure and percentages for affordable homes. However the Age profile trend for the Plan period shows that nearly all growth in the population is in the 65+ age group. (ONS) (2023) and the LP seems to presume that sheltered housing and care homes are the only issue. They are not. Building suitable new homes and supporting the adaptation of the existing housing stock will be critical as the population ages (East Devon Local Housing Needs Assessment 2022). However there are surprisingly similar requirements among young people and retiring people around the need for small open-plan homes well equipped for broadband fibre-to-premises which will facilitate home-working and/or telecare. These homes can be open plan 2 bedroom flats, or open plan houses and bungalows if they are accessible and equipped.

Full name: Mike Allen

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Policies HN03 and HON4 require careful review in the LP regarding market housing, rentals, and affordable homes for all ages and abilities, while adhering to NPPF guidelines. While young people are not the only victims of the housing shortage in Britain, they are some of the most severely affected. Reduced home ownership rates, increased rent prices and living with parents all impact a young person's employment opportunities and chances of starting a family. A key policy challenge is therefore to improve the suitability and availability of housing for young people, with studies pointing towards two specific areas of improvement. First, a healthier housing-for-rent policy must be developed that provides for both young people's housing needs and meets the demands of landlords. Second, policy makers, landlords and house-builders need to offer housing which is better suited to the growing phenomenon of shared accommodation among younger adults. These planned 3-bedroom larger homes are beyond the reach of first-time buyers. In contrast, the well-being of older adults and those with disabilities has been neglected by our local planning policy. Policy HN03 is too restrictive since it limits such housing to within 400 meters walking distance of local facilities and shops. This policy really only applies to sheltered housing for the frail. HN03 policy as it stands is ageist. Older people use cars and internet just as much as younger adults. Programmatic, and clinical interventions prove the need for good housing is an important social determinant of older adult function and quality-of-life. There is a key health issue here: extending life expectancy means housing wealth increasingly funds longer periods in retirement and ill-health. Any lack of such assets produces disadvantage within our current social welfare system. Poor housing and inadequate resources for home-care are associated with more hospitalisations, nursing home admissions, and earlier mortality. The National Health and Aging Trends Study shows half of community-living older adults with low- and moderate-incomes have a self-care, household, or mobility disability. Housing characteristics for the old and young and disabled, is a domain that has previously been neglected in discussions at Strategic Planning Committee level and consequently in our Local Plan. A change of required housing and specifications would help address this deficit. There is an aspect of the LP influence on our EDDC housing

market which we can use to advantage to meet the real needs of our residents: Where people over 55 are looking to release equity and move to smaller homes, there has been little progress in improving housing options for older people. For such house-movers, health, and family issues become more important with age, and financial reasons are least important. So we should avoid framing the housing shortage as just an issue of affordability or an intergenerational war where the young can prosper only by triumphing over the old. (see Housing needs of young people 2024 report House of Lords Library). By providing more smaller homes would help “downsizers” move into a nearby and smaller home in their own neighbourhood. This would mean that people will retain their social and health community support networks, yet houses will be released for the families which need them. When it comes to facilities, both young and old now need internet connections as much as they need electricity and water. Telehealth services are becoming a key way of developing home welfare, access to work and welfare electronically. Systems now allow health and care professionals to monitor and communicate with people in their own homes and for people to manage their own health conditions using remote technology. Smart technology and meters that allow individuals to review or control energy consumption, heating and security; and home sensors to monitor and provide information about the condition of homes, such as damp or carbon monoxide, will improve health issues. Since 1990 Rates of building specialised housing have declined, leading to fewer opportunities for older people to choose. Building smaller, smarter and energy efficient market, affordable and social homes for older people would reduce demand on health and care services, but will require homes that support new technologies and are safe, accessible and adaptable. All homes will need to adapt to accommodate new technologies and have sufficient space for care provision. For example, telecare applications will need sufficiently high speed Internet to work. (DCLG analysis) In regard of Social housing needs: poverty rates in England are typically higher amongst households containing disabled people. Half the households in poverty have a disabled family member, yet only 5% of homes have the required features needed for disabled access. This LP intends that deficit to continue. Yet of the remaining 95% of homes, more than half would require internal structural or major alterations to make them suitable for frail or disabled people. Nationally 26% of people have a disability, and in Devon it is 29.5% (JSNA 2018) yet it's estimated that less than 6% of the national housing supply is designed to be accessible. ESA claimants in the EDDC area numbered 3490 at December 2021 of 149100 in the population. Levels of dementia diagnosis in Devon highlight a potential gap of unmet need where 2 in 5 people aged 65 and over are estimated to have dementia but are undiagnosed (JSNA 2021) It seems that our plans that only 5% of new homes have M4(3) standards is sadly inadequate. The desire to age in place reflects the importance of maintaining social connections that are linked to the home's location. Moving had a small but significant negative effect on health status among older adults, even when they were relocating to a location that offered more support. There is a need to combine

a traditional spatial focus on home, housing, and neighbourhood with an intersectional one that is focused in age and disability(see McKee et.al. 2024) This needs-based policy area affects many aspects of EDDC Housing provision. It seemed right and very important, to have housing/ welfare/ public health and Planning Policy views integrated with experiences from Planning officer views to see how more granular specifications can be introduced into either policy HN03 and Policy HN04, to specify our approach to meeting the real needs of all ages and abilities in East Devon. We have historically encountered weaknesses in the standards of housing design policy especially in regard to minimum sizes of house rooms and accessibility The NPPF has specified a need to look closely at the density and efficient use of Land, and these suggestions will improve our compliance with this policy. Therefore a review of our Local Plan policies on types of housing is essential to ensure new housing is suitable for each population segment. At present HN03 is just focused on residential care and nursing homes or sheltered accommodation rather than spelling out clear standards for young, old or disabled in general market housing (which is only a passing mention in HN03) While the acute needs of housing accommodation seekers are put as low as 200+ in East Devon, this figure does not necessarily reflect the needs of single people and young families living in parent's homes. In addition, the increasing need for more frail older people to move to sheltered or similar accommodation needs to be firmly anchored in clear policy interpretation. The NPPG chapter on Health and Wellbeing seeks neighbourhoods where healthy and active lifestyles can be enjoyed by both young and old. It specifically states that the Government supports: "the creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments." The Government has encouraged an integrated policy to public healthcare. Joint Strategic Needs Assessments, Health and Wellbeing Board, and other local health and adult social care commissioning reports and documents have provided useful background data. But these have not been reviewed by the Strategic Planning Committee. The local need and future areas for investment with regard to older people and the young is clear. Unfortunately the East Devon District Council approach is not compliant with this Integration policy if it does not take account of the housing design and neighbourhood facilities needed for frail older people and disabled. A focus on sheltered and institutional accommodation is there, but it does not specify sufficient housing with wheelchair accessibility, nor local leisure facilities such as benches for people who cannot walk far. Consequently there is less opportunity to encourage healthy walking. During the development of the previous and current Local Plan, studies were done and made public about different needs at different ages in our population. These do not appear in the evidence base. Yet the Council has extensive information from the poverty working group. Should we now bring in more radical policies for creating affordable small homes? Should we promote single-story homes even though

the NPPF emphasises density? Is it necessary to strengthen age diversity within housing standards policies? I am hopeful that the results of a review of the Regulation 19 Plan by Officers and Members will resolve these issues.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Strategic Planning Committee should change HN04 to require 30% of new homes to meet M4(3) requirements for wheelchair accessible dwellings not 5% because this lower target does not improve on the present inadequate national and local level.

Arthur Keith Amor

Full name: Arthur Keith Amor

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo 20 would significantly increase car use in the area and as the access to the proposed development is closer to Budleigh Salterton than Exmouth the tendency of the occupants of the site would obviously be to drive into Budleigh and increase the already congested streets in the town. The development would have serious detrimental effects on the wildlife and fauna of the area including the nearby pebbled heaths

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

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

Dr Robert Amos

Full name: Dr Robert Amos

Proposal:

7. Adapting to Climate Change

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:

The use of arbitrary data (in this case a study commissioned with the University of Plymouth) in defining policy is not legal and is not justifiable. The CCMA cannot be defined by a single data source as it has huge impact on the properties and lives of their owners within that area. At worst there should be multiple studies commissioned so that data can be cross referenced and assumptions challenged. If multiple sources of data concur then a data map can be defined. A better approach and one that would not have a detrimental impact on the coastal properties would be to avoid creating an area which is blanket prohibited from development of any kind, but instead to assess each application for development on its own merit. If there is a good reason for not allowing development to go ahead then at least the coastal community wouldn't feel that it has been discriminated against without due consideration.

2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the defined CCMA map and boundary Allow all residential development applications to be assessed on their own merit

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

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: The reliance on a single source of arbitrary data which will most likely have flaws

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

Please be as precise as possible.: As above

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

4(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As drafted, the section on CCMA fails entirely to comply with a duty to co-operate because it discriminates against residential households. It is a travesty of justice that in this day and age we have to pander to such over cautious, environmentally driven stupidity at the expense of protecting and supporting the lives and wellbeing of our tax paying residents

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

Vicky Anderson

Full name: Vicky Anderson

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Richard Peter Stuart Andrews

Full name: Richard Peter Stuart Andrews

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

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

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

Mark Ian Andrews

Full name: Mark Ian Andrews

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20 Do not access the site via the B3179 Do not access the site via Southern Wood Revert to Exmo_20b as previously proposed.

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

Mr Mark Andrews

Full name: Mr Mark Andrews

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The

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

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20 Do not access the site via the B3179 Do not access the site via Southern Wood Revert to Exmo_20b as previously proposed

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

Valerie ANSFIELD

Full name: Valerie ANSFIELD

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It is notable is that at the meetings attended and contributed to by residents and Town representatives, sites GH/ED/27 & Otry-1 O were not selected for development (for many reasons including what follows) but they have somehow been included at a later stage thus prompting questions about due process. Continued as attached

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Sites GH/ED/27 and Otry-10 should be excluded from development sites allocated by virtue of the process adopted AND their lacking in viability. Suitable sites for the right type of housing in the right location should be sought instead.

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

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

suitable transport networks, education facilities, sports and recreation facilities can be secured : simply requiring money of potential developers is only part of the implementation required. A comprehensive plan to achieve is required in all of this

There's no evidence in this that East Devon can require compliance from providers of Education, Transport Services etc that would meet the aspirations stated nor is doing so at present

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

Stephanie Arris-Barker

Full name: Stephanie Arris-Barker

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

Feniton can just about cope as it is, but to have more houses, more people, more things on the road, would mean much more damage to roads etc. School can't cope nor the doctors. You'd be putting our lives in peril in more ways than one. Wake up people. Surely you aren't that blind or evil. No more pushing at the moment we a healthy village. Any more cars, lorries, busses would harm our fresh air. We want to live, not be killed off by bullies like you lot. Stop now.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No more building or transport coming to our village. We're big enough and over spilling as it is.

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

Nicola Jayne Ashton

Full name: Nicola Jayne Ashton

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Full name: Nicola Jayne Ashton

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

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

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed housing allocations in Exmouth ... A town currently with insufficient sewerage infrastructure, demonstrably broken sewage network and demonstrably under capacity of the sewage treatment facility so without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan."

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove site Exmo_20 from the Local Plan The policy does not take into account the already acknowledge failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

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

Phil Ashworth

Full name: Phil Ashworth

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point for EXMOUTH-20 is significantly closer to BS than Exmouth. The new residents would overwhelm the infrastructure and amenities and would lead to BS and Exmouth “joining up” contrary to Policy OLO5 of the local plan.

An alternative site could well be contrary to PB01. A development would harm the heritage assets. Inc the grade 2* St John in the wilderness church contrary to he02 It would contravene the wildlife sites in OL01 and destroy wildlife.

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

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

Chris Aston

Full name: Chris Aston

Proposal: 16. Community Facilities

1. To which part of the Community Facilities chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph or policy number that your representation relates to.: 16.2

2. Do you consider that this part of the Community Facilities chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Community Facilities chapter is not legally compliant. Please be as precise as possible.: Each of the proposed new homes in this development alone will have approximately 2 children as an average of the UK population. You state that council supports expanding or developing new facilities particularly in substantial development propositions. yet there is no mention of a new secondary school (to support one of the largest secondary schools in Europe). We know historically that developers in the SW are keen to build due to the 150% mark up on homes in the SW (and SE) and the lack of community facilities that require to be built due to age demographics that do not seem to support a requirement for such facilities. Apart from the fact that family size homes can only justifiably be aimed at 'Families' ergo having children who have a right to a good education. Please direct me to where this is covered in the proposal.

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

3(b). If no, please give details of why you consider this part of the Community Facilities chapter is not sound. Please be as precise as possible.: No recommendations for additional secondary schooling for circa 1400 children.

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

4(b). If no, please give details of why you consider this part of the Community Facilities chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The NPPF actually states that in the case of rural communities (Para 82) that it should be proportionate to the needs of the local communities. The local community needs more educational facilities, healthcare facilities and improved sewerage infrastructure NOT people. So Duty to Co-operate here only applies where application take into account local community 'needs' in this case this application does not.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to ensure that actual local considerations are being truly reflective in the proposals.

Full name: Chris Aston

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

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

3.4

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: You state that there is 'substantial' employment opportunities in the area. This is false. There is not. Please describe where 700 plus home with circa 3 persons per household will both now and in the near and long term be able to access jobs that support local economic growth. It further states that there is extensive infrastructure, again this is a falsification. The adjoining country roads already cannot cope with the amount of traffic heading to and from Exeter or the M5 with degradation of the road surface due to volume of traffic a never ending maintenance task, not to mention the lack of pavements, cycle safe paths or crossing points to woodbury common.

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The wording should read, 'whilst there is currently not a large and diverse range of employment opportunities in the area, we will hold any developer to account to first develop a secondary school, appropriate healthcare facilities as well as sewerage and travel infrastructure that can support such a development'

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: You have already stated that Exmouth has a high population comparatively to the rest of the East Devon area. Yet we know that adding more homes in the area is compounding the housing problem. By introducing homes that are still out of the price range of many people who work in the

area all we are doing is encouraging cash wealthy families to relocate into the area, they can afford the homes (as developers on average can charge 150% more for a property in a desirable location, rather than in a location which provides more job security but is not as pleasing on the eye. All development should be to the west of Exmouth in order to allow access to the M5, train stations and wider cycle network which does not exist in the proposed location. Throughout the documents there is no reference to how educational needs of children and young adults will be met nor how the travel infrastructure will be improved without impacting surrounding natural habitats.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Spatial Strategy chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Yes this does and active engagement with the local community for considered planning is 100% necessary.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : We experience daily the effect of ill considered planning and development in everything we do in East Devon. From trying to get children into secondary schools in the area to trying to simply 'move' around the area and make use of the facilities which are already overburdened.

John Ernest Bailey

Full name: John Ernest Bailey

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Figure 3

2. Do you consider that this part of the vision chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the vision chapter, please use this box to set out your comments.: Yes, but ultimately will be dictated by parliament which has no intention of allowing this council or, indeed any other to implement a practical and considered policy based on availability of services like, adequate medical services, adequate roads etc. To complete these tasks effectively we require, not just academic ability, but a high level of management and deep practical understanding of cultural diversity along with, the many different professions needed to complete the task. There is little doubt in my mind that the majority of MPs representing this country have few if any of the aforementioned qualities that are required, so will therefore simply dictate to this and similar councils what they want to achieve without the ability to consider the obvious outcome. The reasons for answering Yes to this question is simply because parliament dictates the laws in this country and will change laws to favour their own objectives.

Richard Bailey

Full name: Richard Bailey

Other party name (if relevant): Hobart Land Ltd

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Strategic Policy SP01:

Spatial Strategy sets out that “New development will be directed towards the most sustainable locations in East Devon, by: ... C. Promoting significant development at the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve their own needs and that of the wider surrounding areas;

This overarching strategy for the Main Centres is welcomed.

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

In this context, and given the earlier comments about bolstering the allocated land for housing delivery, we consider that the land at the former showground site provides a good opportunity to deliver a mixed use residential and sports development on the edge of Honiton. This would assist in addressing both the need for more sports pitches and housing. If the former showground site was included in this then the total supply could be increased to approximately 988, as well as securing the delivery of 4 junior rugby sports pitches. This would be a positive addition to the development strategy for the town.

The site is located in an accessible location approximately 900 metres from the town centre. This is a reasonable walking and cycling distance. Also, the site has an existing

access on Langford Road which can be improved as necessary alongside other highway improvements, such as pedestrian crossing, extended footway and cycle route facilities, to provide improved connections.

The former showground site is available, suitable and achievable (as the findings of the HELAA [November 2022] found with regard to the part submitted for assessment - Honi_9) and could be developed with limited adverse impacts, it appears that there is reasonable alternative to the current

strategy that would help further to ensure that the necessary minimum levels of housing are achieved and exceeded, and that some playing pitch provision for the town of Honiton is delivered.

In summary, we support the emerging Spatial Strategy in terms of the direction of growth to the Main Centres, however, we suggest that the Council could pursue a better alternative strategy with regard to the housing target and meeting the full housing need based on the revised NPPF, and bolstering the identified supply of land for housing to ensure that the minimum target is achieved and exceeded.

Full name: Richard Bailey

Other party name (if relevant): Hobart Land Ltd

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: The levels of future housing development are outlined in Strategic Policy SP02. This states that “Housing provision will be made for at least 20,909 dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042. The housing requirement will be delivered through a stepped trajectory, with an annual target of 850 homes from 2020/21 to 2031/32, increasing to 1,070 homes per year from 2032/33 to 2041/42.”

The level of housing identified is supported in the main, however, it only represents 80% of the housing requirement calculated using the new standard methodology introduced in December 2024 by the updated National Planning Policy Framework (NPPF). Although this approach is acceptable under the transitional arrangements set out in the NPPF (Annex 1 - Paragraph 234) it is questionable given the recognised housing crisis whether East Devon District Council should be looking to exceed this and plan for the full housing requirement, which would equate to 26,136 dwellings over the plan period, or at least a partially increased figure.

Additionally, given that this is a minimum housing requirement, it is crucial that there are sufficient allocations made to achieve and exceed the target. Whilst there is expected to be some flexibility in the projected supply over the plan period (1705 units / 8.2% over the minimum target), as set out in the Council’s Housing delivery technical note (February 2025), there is scope for this to be improved. Increasing the amount of land available for development will provide more choice and competition in the supply, which should have benefits for delivery. It would also provide greater flexibility and resilience to the supply. The amount of allocations put forward as whole could therefore be expanded to help ensure that levels of housing above the minimum target can be achieved. Given the pressing need to boost the supply of housing land, additional

allocations (including land associated with the former showground site at Honiton) could be included to achieve this.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: In this context, and given the earlier comments about bolstering the allocated land for housing delivery, we consider that the land at the former showground site provides a good opportunity to deliver a mixed use residential and sports development on the edge of Honiton. This would assist in addressing both the need for more sports pitches and housing. If the former showground site was included in this then the total supply could be increased to approximately 988, as well as securing the delivery of 4 junior rugby sports pitches. This would be a positive addition to the development strategy for the town.

The site is located in an accessible location approximately 900 metres from the town centre. This is a reasonable walking and cycling distance. Also, the site has an existing access on Langford Road which can be improved as necessary alongside other highway improvements, such as pedestrian crossing, extended footway and cycle route facilities, to provide improved connections.

The former showground site is available, suitable and achievable (as the findings of the HELAA [November 2022] found with regard to the part submitted for assessment - Honi_9) and could be developed with limited adverse impacts, it appears that there is reasonable alternative to the current

strategy that would help further to ensure that the necessary minimum levels of housing are achieved and exceeded, and that some playing pitch provision for the town of Honiton is delivered.

In summary, we support the emerging Spatial Strategy in terms of the direction of growth to the Main Centres, however, we suggest that the Council could pursue a better alternative strategy with regard to the housing target and meeting the full housing need based on the revised NPPF, and bolstering the identified supply of land for housing to ensure that the minimum target is achieved and exceeded.

Full name: Richard Bailey

Other party name (if relevant): Hobart Land Ltd

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

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

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

Strategic policy SD03 details the allocation made for Honiton and these allocations provide for a total of 839 dwellings at the town (including completions). There is no reference to sports pitches being provided as part of any of the allocations.

The current Playing Pitch Strategy for Honiton (February 2017) set out plan to deliver additional playing pitches for the town. This included the provision of five rugby pitches at the former showground site plus football or cricket pitch provision at St Rita's. It is acknowledged that the Playing Pitch Strategy for the District is being reviewed at present and that is to be issued Spring/ Summer this year, however, it is notable that none of the additional pitch provision identified in the 2017 pitch strategy for Honiton has been delivered.

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

In this context, and given the earlier comments about bolstering the allocated land for housing delivery, we consider that the land at the former showground site provides a good opportunity to deliver a mixed use residential and sports development on the edge of Honiton. This would assist in addressing both the need for more sports pitches and housing. If the former showground site was included in this then the total supply could be increased to approximately 988, as well as securing the delivery of 4 junior rugby sports pitches. This would be a positive addition to the development strategy for the town.

The site is located in an accessible location approximately 900 metres from the town centre. This is a reasonable walking and cycling distance. Also, the site has an existing access on Langford Road which can be improved as necessary alongside other highway improvements, such as pedestrian crossing, extended footway and cycle route facilities, to provide improved connections.

The former showground site is available, suitable and achievable (as the findings of the HELAA [November 2022] found with regard to the part submitted for assessment - Honi_9) and could be developed with limited adverse impacts, it appears that there is reasonable alternative to the current

strategy that would help further to ensure that the necessary minimum levels of housing are achieved and exceeded, and that some playing pitch provision for the town of Honiton is delivered.

In summary, we support the emerging Spatial Strategy in terms of the direction of growth to the Main Centres, however, we suggest that the Council could pursue a better alternative strategy with regard to the housing target and meeting the full housing need based on the revised NPPF, and bolstering the identified supply of land for housing to ensure that the minimum target is achieved and exceeded.

Michelle Bailey

Full name: Michelle Bailey

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This area, combined with others which were put forward in the Local Plan for development within Broadclyst would see an increase in the housing population by approx. 15%. This is far in excess of the housing needs put forward just a couple of years ago, when the Parish were first putting together their Neighbourhood Plan. I believe at that time there was a request to consider where 30 houses could be sited and after lengthy consultation through the Neighbourhood Plan suitable areas were identified and others discounted. This particular area was strongly opposed by local residents as an area for housing development due to its location and the impact on the local environment. This proposal seems to be at odds with the Neighbourhood Plan by showing very little consideration to the work the Parish has already done with regards to local consultation which has now spanned several years. I would implore EDDC to review this and ensure any proposals are not at odds with this – after all the Neighbourhood Plan is the voice of the village!

If you look at feedback within the previous Local Plan consultation (where many provided their feedback) you will note:

Broadclyst - Increasing boundary by 50% will change character of village Proposed sites in Broadclyst are beyond settlement boundaries The BUA boundary for Broadclyst in the Broadclyst Neighbourhood Development Plan and the adopted EDLP does not include the preferred sites LP_Brcl_09, LP_Brcl_29 and LP_Brcl_12, but the proposed EDLP seems to have redrawn the boundary (now referred to as a Settlement Boundary) to include these sites. There is no justification to this redrawing and it is misleading and

intended to deceive so as to provide justification for development on these 3 preferred sites in accordance with paragraph 3.75 of the proposed EDLP. The original BUA boundary for Broadclyst should be retained when considering development.

Grade 1 Agricultural Land The land in question is Grade 1 agricultural land which by definition should be the most productive type of land for farming and needs to be protected as such. The land is currently used for a mixture of animal grazing and market gardening. By putting this forward as an area for development, are EDDC saying that this is no longer important? This does seem at odds with the EDDC Development Policy which states that such developments are not in the interest of food security into the future. Once sold for housing, it's gone.

Much of the lower lying land in question is prone to flooding and with a high-water table is building on this land really suitable? It is very likely to cause further flooding in the surrounding areas and for nearby properties particularly as parts of the land in question are higher than these properties. Whilst the proposal suggests the site is flat, this is simply not true.

There is a lack of provision for waste water and sewerage in the vicinity and without significant investment the current pumping station which often backs up will not cope with any additional burden. There have been multiple occasions where even with little rainfall South West Water have had to intervene to clear the ditch leading pumping station for several hours at a time. Increasing the levels of sewerage increases the risks associated with releasing nasty phosphates into the surrounding area and will have a direct impact on the River Clyst and its wildlife inhabitants as the villages waste water heads out of the village.

Loss of habitats and wildlife Before any development goes ahead a full and comprehensive review of the habitats and wildlife in the area needs to be done to determine its impact. There are red listed birds, foxes, rabbits, a number of small mammals and insects, protected news (great crested newts are known and reported to be within the pond area within the development area but also in the surrounding properties) as well as bats all living within the fields being put forward for development. The loss of the fields and hedgerows will have a devastating effect on these. There is a pond area within the proposed development site next to this one (not owned by the Winter Gardens land owner or the National Trust) which must be protected, along with

their surrounding territory and routes and evidence to demonstrate this is being considered by the developer should be requested.

Some of the fields adjacent to the development are used for farming by others, such as for grazing sheep. The development is likely to have an adverse impact on the ability for these fields to be used for such purposes therefore further impacting local farming. Noise, light pollution as well as an increase in rubbish is a very real concern for the welfare of these animals in these fields.

Adverse impact on the historical setting of Broadclyst Broadclyst as a village is home to a number of listed buildings and has conservation areas (as highlighted in the rejection of other proposed housing calls for land also put forward as part of the Local Plan consultation).

Surrounding the Winter Gardens site itself, there are a number of listed buildings and the curtilage for some of these properties is adjacent to the proposed development. Besides Lake House and College Cottage which were highlighted by EDDC, there is Lake Farm, Markers Cottage, Symes Cottage, Hackworthy Cottage and Heath Gardens all of which have had very strict planning constraints put in place to restrict development to them. It is imperative that the Listed Building Conservation Team are consulted as part of these proposals to ensure the historic nature of these properties are protected. As highlighted previously, some of the proposed site for development, particularly the area near the surrounding properties is much higher up thereby likely to have an adverse impact on their outlook. In the Local Plan feedback it was noted 'Heritage commentary - Site is 20m from a grade II listed building which would need to be considered'.

Besides the listed buildings, many houses within this area of the village are of a more rustic and unique appearance given their age and it is important the development if permitted is sympathetic to this.

The houses within the Maple Road area have many restrictive covenants in place due to them being built on National Trust land. Can the same level of covenants be applied to this development to ensure future proofing against unrestricted changes to the area?

Part of the appeal for residents within this area of the village was the rural / countryside views, low levels of light and noise pollution. This will all disappear and devalue many of the surrounding houses. No more starry nights!

Highways and traffic One of the fundamental concerns is highways and the ability for the local roads to cope with an increase in traffic. A development of this size is likely to see in excess of 350 cars being used on the surrounding roads. Roads that simply can't cope as they are. Given the proposed location this will very likely have a direct impact on the Whimble Road leading towards and through either Station Road (past Clyst Vale) towards Cranbrook, or through Dog Village. Given the daily chaos at school drop off and pick up times this will only get worse. Unless the developers and highways can come up with a better highway's solution then there will likely be further delays for traffic in the area as well as a much-increased risk for residents and local schools' pupil's safety. Added to this there will be an increased level of pollution.

It is with interest that I note on the LVA's consultation that they suggest that the current public footpath could be used as a combined cycle path. This is a nonsense. The public footpath goes into a private track before joining onto Town End - there is no lighting. The track is solely maintained by the residents who live along the track. The track outflows into Town End where if you turn left you head into the built up hedge, single track lane without any lighting. If you turn right, there is a single track and a light several metres down the road before there are no further lights. There are no adequate footpaths. This is a dangerous proposal and needs to be challenged. Using Town End for people or bikes should not even be considered or encouraged. Increased footfall is of real concern for the pond area which will pose a significant threat to the great crested newts and other wildlife.

Parking and traffic congestion pinch points There will be an increase in demand for parking in the village as the Winter Gardens development's location is likely to see residents driving into the village to either access the local services or the primary or secondary school due to the lack of pathways from the area and on the surrounding roads. There are currently many residents living within the village boundary driving to the primary and secondary school for school drop off and pick up because of the lack of pathways or where they have very young children or need to get off to work or off to after school activities promptly. The current parking most days is very dangerous, causes delays and much stress to parents who use the narrower areas of Town Hill and Town End as a cut through to avoid the congestion around Dog Village. This is likely to mean more parents will be forced into Dog Village.

Increased demand and lack of transport links The local buses are struggling to cope with current demand where buses are irregular and over full at peak times, the burden on this service is likely to increase. How will these issues be mitigated? The bus stops are currently along the main B3181 which are a reasonable walk from the proposed site but again without better pathways to facilitate access to these this may prevent people from using them. There are no alternative transport links e.g. railway within easy walking distance of the site. People will therefore be largely forced to drive to neighbouring villages to access these links.

Resident and Pupil Safety Whilst alluded to above, the Winter Gardens development location, poses a real challenge in terms of road safety for pedestrians as there is a lack of pathways along the Whimble Road, along Woodbury View and Town End. Town End is currently accessed via a narrow single track lane with high hedging so without removing this there is no room for pathways. Along Town End most houses front onto the roadway and there is a lack of space to incorporate pathways without narrowing the road even further. Given the current issues with parking along the road, pedestrians are already at high risk walking along this road due to its narrowness and the number of school parents parking along it for drop off and pick up. Woodbury View and Whimble Road face similar challenges with on road parking from residents and a lack of pathways. At present, emergency services or delivery lorries struggle to access properties at peak traffic times.

There are significant challenges within close vicinity of the Clyst Vale Community College and Broadclyst Community Primary School due to the current levels of traffic and lack of pathways; this development would only add to that. It is worth noting much of this area is not covered with street lighting at present particularly along the Whimble Road and Town End, so provision needs to be made for this.

The likely increase in traffic and lack of adequate and safe cycle paths is a cause for concern. Unless some assurances can be made to improve the provision within the area there is a real risk of an accident happening and we are likely to see the use of bikes reducing.

The surrounding area sees a number of livery yards so again there will be an increased risk to local horse riders accessing local roads to exercise their animals.

After much resident debate, the exercising of dogs on the village playing field has been banned, with dog walkers being encouraged to access wider areas surrounding the village. Many therefore walk away from the village centre to access one of the designated walking areas by crossing the Whimble Road onto an unpathed roadway (Elbury Lane). There is a local bike park within this area too; therefore increasing traffic in this area will further endanger any young people who wish to use it. There is currently a public footpath which runs through the proposed site and needs to be retained. The proposal to use the adjacent field for recreation purposes is of significant concerns given the terrestrial habits of the great crested newts present on the site.

Demand for local services Both the current Primary and Secondary schools are at capacity. The Primary school is oversubscribed and with its Outstanding Ofsted rating this is likely to continue. This is likely to mean that new residents to the area are likely to be unable to obtain places immediately in either school and will be forced to access other schools in the surrounding area thereby increasing traffic leaving the village and burdening outlying schools.

In the Local Plan feedback DCC Education confirmed: 'Broadclyst Primary School is very popular and fills up with out of area children. Development within Broadclyst would mean that there would be a push back to other schools. The current primary school could not support the level of development proposed -36.8 ha, and could not be extended further. Additional new secondary provision required to support any development'

The Broadclyst doctors' surgery is overfull and is currently being forced to take patients from both Whimble and Cranbrook due to the lack of services in those locations. Unless something is done to improve the situation within those areas, this situation will only get worse. There is no scope to extend the current surgery building.

Whilst there are some youth services in the village, there have been some challenges in Broadclyst with regards to youth behaviour and vandalism perhaps in part driven by the lack of youth services. The local sports centre post Covid is certainly not back to its pre Covid offer of activities and is running without a receptionist. What investment will be developer provide to improve these services to help keep our young people engaged? A playpark and a field which have been suggested by the LVA is not sufficient.

What provisions and support will the developers provide to support an increased need for elderly residents? Will any of the housing being proposed be suitable for the elderly? Currently much of the work done locally to support the elderly through Clyst Caring is managed by volunteers which are often hard to recruit. As above, the lack of pathways from this area will pose a real challenge to any new elderly residents accessing the centre of the village where this centre is managed.

The village currently has a small provision of amenities such as a local shop with post office, hairdresser, takeaway, charity shop and social club, however, whilst on paper this sounds attractive and sufficient to support more housing, the reality is that these can be hard to access as parking currently for any is at a premium. Often the village car park is overfull, resulting in the surrounding roads being parked in hindering access for residents to their homes or places such as the doctors' surgery being inaccessible.

Whilst the proposal may have bring benefits in terms of increased footfall to the New Inn public house adjacent to the site; it is likely to inhibit their ability to put on 'noisier' events particularly of an evening which many current residents enjoy without upsetting and getting complaints from residents in the area. One of the appeals of this pub currently is its rural location and that it is slightly more 'countrified'. When larger events are put on, parking becomes a challenge and people park on the Whimble Road. With an estate being built opposite, this problem, will quickly become the their problem and cars will inevitably park within this new estate. I understand the public house do not support this development.

Housing density and green spaces The proposed development seems very ambitious in terms of its scale and the density of housing proposed when added to the neighbouring proposal (site 12). Looking at developments in outlying villages and towns, many now face significant challenges due to being crammed in and the lack of provision made for simple things such as parking. How will EDDC satisfy themselves that this is being considered?

There is one central play park for the village which can only be accessed by limited pathways from this proposed area. It would be prudent to ensure sufficient green spaces / play areas are developed within the site.

In summary Fundamentally, without significant investment in the area surrounding the proposed site, it is not suitable for development. If it goes ahead, who will pay for these improvements? What guarantees will there be to ensure this happens knowing how it has failed in other developments locally? Will allowing this development set a precedent for further development in the village in the future?

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of the sites in entirety would be the best outcome; failing that a significant reduction in the number of houses being proposed for the area and significantly greater recognition that habitats will need to be protected with substantive mitigation put in place to protect the protected species within the site e.g great crested newts. Additional protection of the historic landscape with consultation through the Conservation team ensuring that any development is in keeping with the surrounding area and recognition any development should not be to the detriment of Lake House or Lake Farm which are within 20m of the proposed development. Recognition and mitigation of the significant burden the development will have on the surrounding infrastructure and services which will not cope with the volume of house being proposed.

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

Christopher Baker

Full name: Christopher Baker

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Not an appropriate site. Contravening existing policies eg PB01. OL01. OL09

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

Roger Baker

Full name: Roger Baker

Proposal:

5. Development in the Towns and Villages

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

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

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

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

The infrastructure to support this development is not there.

The site lacks safe pedestrian access and the traffic impact on access and egress through Bramley Gardens onto and from Church Road is unsustainable.

Evidence of the capacity of Church Road to cope with the volume of existing traffic and the safety of pedestrians in what is in large parts single road, is currently under review and of concern to a number of residents.

The site forms part of the Green Wedge between Whimble and Cranbrook.

There is no justification for the need of additional housing in this area given the permission for the development 1500 houses, immediately adjacent in the next phase of the expansion of Cranbrook.

Cathy Balcer

Full name: Cathy Balcer

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Dr Claire Balmer

Full name: Dr Claire Balmer

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Although I support the need to build AFFORDABLE housing in Devon, I object to the proposed sites Exmo_17 and Exmo_20.

The primary reason is because infrastructure and safety for current residents has not been addressed and must be before ANY new building plans are approved in and around Exmouth. These include (but are not limited to) clean water supply, flood risk, road use and social services. Significantly, these sites will directly impact the traffic and therefore safety of already overused adjacent roads which both are limited to single lanes at points.

Furthermore, both sites will impact local protected land and I feel there are more appropriate sites available. The beauty of the area must be maintained (and a precedent of destructive and ill thought land use throughout Devon must be prevented) because this is our unique selling point and what many local businesses and livelihoods rely on.

Richard Banfield

Full name: Richard Banfield

Other party name (if relevant): Rosemary Banfield

Proposal:

5. Development in the Towns and Villages

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

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

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

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

1. The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICYPB01 of the local plan and not in accordance with the mitigation strategy.

2. Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

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

4. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the

bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

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

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

7. Serious sewage and drainage issues with South West Water are already having very detrimental effects on the amenities (beaches etc) and tourism / small businesses in Exmouth and Budleigh, which can only be exacerbated by this development.

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

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

Christopher Bargmann

Full name: Christopher Bargmann

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

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

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

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

There are multiple issues with this allocation. The site is on agricultural land outside the designated built up area boundary which is contrary to both the EDDC Local Plan and the Ottery st Mary/West Hill Neighbourhood Plan.

There is a significant conflict of interests over this parcel of land. It is owned by Devon County Council who stand to gain financially (potentially significantly) from a future sale of this agricultural land if it is approved for housing developemnt. Commercial interests of the County Council cannot , and should not, be a driver for the allocation of unsuitable land when there are less controversial altenatives available in Ottery st Mary.

Access is a major problem with both Exeter Road and Cadhay Lane unsuitable for additional traffic. Potential access points will increase road safety risks. Proximity to the Kings School and Sports Centre are a significant concern wrt increased traffic volumes.

The property is a known flood risk - in particular the northern field where the brook suffered a major flood incident in 2008. Significant runoff from these fields onto Exter Road is also a regular occurence and will get worse if housing is allowed. Properties that are, or could be, impacted by runoff water/flooding are;

- The Ottery Sports Centre and AstroTurf sports pitch,
- The properties on Exeter Road, west of the Cadhay Lane junction,
- The Kings School,
- The Ottery st Mary Hospital,
- Thorne Farm and Thorne Farm Way,
- Portions of the Kings Reach housing development,
- Island Farm, and,
- The Finnimore Industrial Estate.

The long term visual impact of development on this site will be significant. The site is well above the existing build line and will be visible from numerous locations and viewpoints in the Ottery region. It will be detrimental to the appearance of the landscape. In addition the proposed scale of the housing development (±90 properties) is totally out of keeping with the rural setting of the site. It represents creeping urban sprawl into the rural environment surrounding Ottery st Mary which cannot be justified and the local infrastructure and services cannot support.

Approximately half of the Thorne Farm site falls within the Minerals Consultation Area defined around the outcrop of the Budleigh Salterton Pebblebeds (BSP) in the vicinity of Straitgate Farm. The BSP themselves are covered by a separate Minerals Safeguarding Area. The BSP are a principal source of sand and gravel in Devon, in particular because of the high quality crushable gravel content. Whilst the BSP are not geologically mapped as underlying the Thorne Farm site, they are mapped on the field to the west. Bedrock outcrop is rare and the presence of the BSP on the western side of the Thorne Farm site cannot be excluded. It is crucial to preserve mineral resources close to markets in order to meet sustainability and climate change requirements and this is enshrined in the Devon Minerals Plan. With expansion ongoing east of Exeter it would be short-sighted to sterilise a potentially viable sand and gravel resource by allowing the proposed development to go ahead. Development on the Thorne Farm site should be rejected as being contrary to the terms of the Devon Minerals Plan.

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

relevant policy or paragraph. Please be as precise as possible.: The allocation of this land for housing is wholly unsuitable, it should be withdrawn as an allocation site. The commercial interests of the County Council should not take precedent over the need for sensible development in Ottery st Mary

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

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The voices of local people should be heard on issues that affect their communities

Robin Barker

Full name: Robin Barker

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 8a is contrary to the agreed plan for the area and commitments made by Cranbrook developers for the retention of the 'green wedge' - commitments which we took into account when moving to the village 12 years ago

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Development should be such that the green wedge is retained - ie not between Whimple and Cranbrook

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: My house is on the narrow single track part of Church Road - a narrow section with no pavements and along which residents of the 8a development will have to pass to access the village shop, church, school. station, village hall and school. This is already congested and traffic frequently takes advantage of my driveway in order to pass (thus

trespassing). If we were to legitimately erect a gate at the end of the drive then traffic would grind to a halt. This is already a major problem and any further development will make it significantly worse.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The proposed developments have already been rejected by the experts in the field, following extensive investigation and expert analysis as well as consultation. Overturning this rejection is contrary to the council's duty to cooperate

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

Gill Barlow

Full name: Gill Barlow

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This proposition has never been offered or shown to the villagers of Otterton. The decision to allow building on this land is not compliant with a democratic society. The Parish Council have not shared any of their decisions with the village. The Parish council should make it a priority to include the members of the village to have a voice in the future of the village especially in such a sensitive area.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The village of Otterton had a Village Plan in place which protected the Orchard from development. It was the wish of the village that land off Bell street was the most desirable land for development.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There can only be co-operation if all parties are aware of the implications. Did EDDC know that Otterton PC had not informed the residents of any of their actions?

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

Simon Barnett

Full name: Simon Barnett

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents including myself said no, but despite this, EDDC voted to remove that protection. Why? Who do you represent if not the people who voted you into office? As you well know National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Is this what you really want? I don't nor do most residents in Exmouth. > Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. They never do. Indeed I don't believe that there really is such a thing as an affordable home. It is a concept only that is never attainable. In addition the proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. Incidentally that very landowner states on its website that they are strongly in favour of preserving the countryside and yet they have sold large areas of beautiful countryside in and around Exmouth to house builders. Money is obviously a higher priority I suggest than preserving the countryside despite what their website says. > A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a cycle path used regularly by myself and my grandchildren as well as a many others.

Have any Councillors taken the time to see how well used it is? > I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17. > The only saving grace for the residents of Exmouth is the sea. We are blessed with having water on 2 sides of the town. Were the water not there EDDC and the developers would no doubt be covering that area in concrete as well. > EDDC have got to start looking at the infrastructure. There is no extra provision water/sewage, healthcare, roads etc. The list is endless. Where is your planning? Frankly it is non existent. Rolle Medical Practice in Exmouth is the largest GP practice in the town. Approximately 23 doctors. If all goes well you can get an appointment to see a doctor in 3 weeks. This is going to increase with all of the McCarthy and Stone residents that have recently arrived in Exmouth and what will 400-500 new houses at Exmo_17 and their residents do for the waiting lists at GPs and dental practices? > EDDC you need to start planning for these issues and not just give the green light to any landowner and developer that wants to make money. It is not too late.

Amanda Barns

Full name: Amanda Barns

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We wish to state we are totally opposed to the proposed development of the Green Wedge between Colyford and Seaton. There is absolutely no need to repeat all the objections voiced by so many before or the reasons why it should not go ahead. Please please please listen to local people and put their concerns and the importance of saving a beautiful part of this area before the greed of profit making developers who just couldn't care less. Do the right thing and you will have the gratitude and trust of local people for all time!

Chris Barraclough

Full name: Chris Barraclough

Proposal:

5. Development in the Towns and Villages

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: As a regular user of the sea who has been unable to use this facility due to sewage pollution, I am very concerned that any increase in property developments will overload our already unsatisfactory sewage system. I have no confidence that South West Water can deliver the necessary increase in capacity. Whilst I appreciate increased housing is required, this should not be undertaken until waste water, including sewage systems have been updated to meet increased needs. Existing pipework is too old and regularly fails leading to the sewage issues we have seen of late. We pride ourselves on being a tourist location, but we are seen as a sewage danger area in other areas of the country. I moved back to Exmouth from Sussex following my retirement. People I know in Sussex have stated they will not consider Exmouth as a holiday destination due to our sewage issues.

graham barter

Full name: graham barter

Proposal:

5. Development in the Towns and Villages

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

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

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

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

There would appear to be no salient consideration of the increase this development would make on the surrounding villages and towns, especially Budleigh Salterton. No plans for the impact on the infrastructure of Budleigh which is over stressed at the moment. Equally the impact on the countryside and habitats would be considerable

Full name: graham barter

Proposal:

5. Development in the Towns and Villages

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

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

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: trythisonegeb1@gmail.com

Linda Bartlett

Full name: Linda Bartlett

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Re the draft publication of the draft of East Devon Local Plan, as a resident of Clyst Road, Topsham, I am concerned about proposals for development in this area.

I believe that the scale of proposed development here is excessive, and will destroy the character of Topsham.

Residents of new developments around Topsham would have no access to the town by public transport, and hence will need to drive into the town, which just does not have facilities for more traffic.

There have been many new recent residential developments in the Topsham area, adding to this huge traffic problem, and also resulting in excessive pressures on local school and doctor's surgery.

I would be extremely concerned if any of the green areas on the East side of Clyst Road are included for proposed development, and I hope these will be preserved as fields, green wedges, or part of the Clyst Valley Park.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I suggest that perhaps the whole of Clyst Road could be designated as a cycle lane, as it has in the southern part by Highfield, and traffic diverted through any new estates. This would discourage drivers from using it as a rat run, and hence ease congestion at Elm Grove Road and Denver Road.

Alison Bass

Full name: Alison Bass

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

Oliver Batson

Full name: Oliver Batson

Proposal:

5. Development in the Towns and Villages

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

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

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

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

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove Exmou_20 from local plan

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

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

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

Full name: Oliver Batson

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Exmo_20 site seemed to be allocated without consultation - I tried to look online and the maps said it was not allocated - however it became apparent that it was allocated despite the maps being wrong and also not being consulted under regulation 18. No public or strategic planning objections were therefore permitted until it was too late. It did not therefore comply with chapter 5 - policy SD01 PCPA 2024 where it said it was not achievable or suitable at the HELAA stage 2.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo20 Site from the local plan as there has not been correct or legal consultation leading up to it

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

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

Please see sheet attached as this box will not allow me to scroll down. Exmo_20 is in total conflict with the following local plan policies under Chapter 5 SD01 - SP01, TR01, TR03 & paras 11.2, 11.6, 3.34 and 2.6. for the following reasons: As a young car driver I drive the B3179 daily - it is the most dangerous road in the area with sharp bends and if a bus / lorry comes in one direction there is not enough room for a lorry and a car. You absolutely take your life into your own hands turning out of any minor existing road (none of which are maintained by Highways) onto the B3179 (St Johns Road, Hulham Road, Dalditch Lane, Inner Ting Tong) and to put thousands more cars out onto that would severely endanger young lives. Quite often when passing the archery club there

have been large queues out onto the road and near crashes. Another entrance there would cause absolute chaos.

It is absolutely ridiculous to suggest that anyone would walk to that site. I live on Dalditch Lane near the site and it is impossible to walk anywhere due to distance, danger, lack of footpaths or cycleways and lighting. That is before you even consider the steepness of the site and its distance from any shops or useful services. Bus services are appalling- it regularly takes me over 3 hours to get back from Exeter to Budleigh Salterton due to cancelled or overcrowded buses and to put more buses on the B3179 will add to the dangerous road. The site is neither connected to Budleigh or Exmouth and is a totally isolated site without any of its own services and not large enough to warrant own shops, surgeries etc. This would mean all the car drivers in that development (and it would be impossible to live there without a car) will be driving many extra miles to get to shops and services as opposed to other sites which are situated on the edge of existing towns.

]] Exmou_20 is in total conflict with the following local plan policies under Chapter 5 SD01 - SP01, TR01, TR03 & paras 11.2, 11.6, 3.34 and 2.6. for the following reasons: As a young car driver I drive the B3179 daily - it is the most dangerous road in the area with sharp bends and if a bus / lorry comes in one direction there is not enough room for a lorry and a car. You absolutely take your life into your own hands turning out of any minor existing road (none of which are maintained by Highways) onto the B3179 (St Johns Road, Hulham Road, Dalditch Lane, Inner Ting Tong) and to put thousands more cars out onto that would severely endanger young lives. Quite often when passing the archery club there have been large queues out onto the road and near crashes. Another entrance there would cause absolute chaos.

It is absolutely ridiculous to suggest that anyone would walk to that site. I live on Dalditch Lane near the site and it is impossible to walk anywhere due to distance, danger, lack of footpaths or cycleways and lighting. That is before you even consider the steepness of the site and its distance from any shops or useful services. Bus services are appalling- it regularly takes me over 3 hours to get back from Exeter to Budleigh Salterton due to cancelled or overcrowded buses and to put more buses on the B3179 will add to the dangerous road. The site is neither connected to Budleigh or Exmouth and is a totally isolated site without any of its own services and not large enough to warrant own shops, surgeries etc. This would mean all the car drivers in that development (and it would be impossible to live there without a car) will be driving many

extra miles to get to shops and services as opposed to other sites which are situated on the edge of existing towns.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmou 20 site has not gone through the correct process of a 'duty to co-operate'. It does not comply with PCPA 2004 section 33A. It was not deemed suitable or achievable at the HELAA stage 2. It was not preferred or a second choice site and has not gone through the correct consultation processes.

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

Full name: Oliver Batson

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The site Exmou_20 was not deemed suitable for development but then quickly became allocated while maps still showed online that it was not deemed suitable or achievable. it was not then considered when Reg 18 discussions took place. It has not therefore been in accordance with NPPF chapter 3 and is not legally compliant

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmou_20 from local plans

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmou_20 allocation is in conflict with policy TR03 (SDS01) and paragraph 11.2 . Being a new car user access onto the B3179 from existing routes is lethally dangerous - including Hulham road,, St Johns Road, Dalditch Lane and Inner Ting Tong. The development of this site will put thousands more cars onto the B3179 which is busy and dangerous and cannot sustain any more traffic. existing small lanes onto the B3179 are not maintained. The site would cause longer journeys into Exmouth and Budleigh from this site. More buses on the main B3179 will make this narrow road even more dangerous. Existing transport services are totally inadequate - today it has taken me 3.5 hours to get from Exeter into Budleigh with buses full or cancelled. Living close to this site in a rural area I have never been able to walk or cycle to shops or town due to distance - steepness of the roads and also because the roads are really dangerous.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Take out Exmou_20 from consideration in the local plan

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I live less than half a mile from the proposed development Exmou_20 - I am on all social media and did not hear about this mass development proposal. When I tried to look into it nothing was showing online that this was being proposed for development. I feel this therefore has not complied with the duty to cooperate under PCPA 2004 section 33A

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

Liz Beard

Full name: Liz Beard

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The Services and infrastructure of Budleigh(high Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to of the local plan coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan An alternative site of Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the site selection Methodology & POLICY PB01 of the local plan and not in accordance with the mitigation Hierarchy to select avoidance over mitigation. Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade 11* listed church, eroding the attractive rural setting for worship & burials which currently exist. This is contrary to POLICY HE02 Exmo_20 would have a detrimental effect on this open countryside and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness, and dark skies", which is contrary to POLICY OL01 Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors contrary to paragraph 13.23 of the local plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site contrary to Paragraph 13.9 Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access is proposed opposite the

SAP/SPA. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth., which is already under additional pressure from climate change. This is in conflict with POLICY ARB01B. Exmo-20 would increase the need for car travel, contrary to Figure 7-the energy hierarchy, and increase traffic congestion, in conflict with Paragraph 11.2 The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6 It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

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

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

Ashley Beare

Full name: Ashley Beare

Proposal:

5. Development in the Towns and Villages

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

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

Additional housing especially affordable housing, ideally for rent as affordable to buy isn't in reality for many is urgently required. Any additional commercial premises used for employment is also a bonus

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Possibly a little large at projected 700 homes but do nothing isn't an option. I understand that many are objecting on environmental grounds but within reason desperately needed homes must come first

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

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

Helen Beaven

Full name: Helen Beaven

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: As I am not a planning lawyer, I cannot comment on legal specifics. However, there appear to have been irregularities in the development of the local plan so far as Feniton is concerned.

I am aware that in previous consultations, there were many representations submitted, including a petition signed by large numbers of residents, which were not taken into consideration because they were not submitted via Common Place. As a result, the views of Feniton residents were ignored as they were not passed on to the Strategic Planning Committee.

As comments were invited, it seems very undemocratic that they should then be disregarded. The use of the Common Place system is not helpful as it is difficult to use, as well as being time-consuming, which is a further deterrent to public engagement in a system which is inviting them.

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

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

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

Because a large number of houses has been allocated to Feniton – way more than the 13 houses which were identified as being needed in the village. When this discrepancy was identified, the Chairman of the Strategic Planning Committee instructed that the policies be re-written to justify such a large increase in development in Feniton. The policies do not now match what is needed or what is appropriate. The proposed development is huge for a village of this size.

The Otry_20 site has come to the table relatively late in the process and there is therefore a concern that EDDC has not had time to consider the impacts of this development as thoroughly as necessary. This site would have a huge impact on the Feniton village, but proper consultation with the Feniton Parish Council has not been possible because the site technically lies within Ottery Parish – for whom it would really have no impact at all. The size of the Otry_20 site is absolutely disproportionate for a village the size of Feniton, but the biggest issue is the roads which the inevitable heavy traffic would have to use. There are two single track railway bridges, one with a blind bend, to navigate, also a section of sunken road which is prone to landslips and all of the access roads have largely single track and already dangerous for pedestrians with passing cars, never mind heavy lorries. Therefore the road access is wholly unsuitable for such a site.

Also, because there were some very significant reasons why the super enquiry in 2014 rejected the various planning proposals on the table then and these reasons have not gone away – if anything there are more:

- There is a station in Feniton, but the vast majority of people still need to use cars to access work and other facilities and the road infrastructure will not accommodate significant amounts of extra traffic. With the main road in and out of the village closed for 3 weeks recently, the queues of traffic attempting to make their way in and out via the old village led to frequent traffic jams. Increased volumes of traffic will only make this more common.

- There is no room in the school.
- The local doctors (and dentists for that matter) have no further capacity.
- Feniton floods on a regular basis. Although the flood alleviation scheme is coming towards fruition, this will not stop the flooding – it will just direct the volume of water away from housing. The area where it will gather is the main road in and out of the village, which often becomes impassable and this will only become a more frequent occurrence (leading to travel issues again). A lot of the water flooding Feniton is run-off from local fields. If the fields are covered over with housing, the run-off will be even more. Other developers have sought to suggest that they will tackle this issue as part of their development, but have not then done so. Unfortunately, there appears to be no enforcement to ensure that developers actually deliver the conditions of their planning approval. Even where some measures have been installed, they have been incorrectly/poorly installed and do nothing to help the situation.
- The sewage network does not operate correctly and cannot cope with the outflow storm water. SWW often visit the village with tankers. They frequently discharge raw sewage into a gulley behind some of the houses leading out of the village (this is obvious because of the items seen floating down there). It is well documented that raw sewage flows into roads and homes. Residents in some of the developments, at times of high levels, have to stop flushing their toilets and ask their neighbours not to do so either for fear that it will back up and overflow out of their toilets. SWW responses have been woefully inadequate. Therefore, additional housing needing to discharge their waste into this network is completely untenable.
- This Local Plan has disregarded the evidence and planning history which clearly shows that development in Feniton is not sustainable. The plan does not allow for any further development of the current infrastructure, so the problems outlined above will only be exacerbated.

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

Local Plan is sustainable and better reflects the Tier 4 status of Feniton and until the issues outlined in 4 (b) have been addressed:

- Removal of Feni_08 from the Local Plan, or to at least reduce the number of houses included.
- Removal of Otry_20 from the Local Plan.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: (This would be more appropriate for the Feniton Parish Council.)

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.

Becky

Full name: Becky

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent pebblebed heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the site selection methodology and policy PB01 of the local plan and not in accordance with the mitigation hierarchy to select avoidance over mitigation.

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

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

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

Development of EXMO_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

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

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

Remove or significantly reduce the size of EXMO_20 from the local plan. Do not access the site via Southern Wood. Access via Sourthen Wood onto Meadow View Road would be absolutely inappropriate. Meadow View Road is already fairly congested with cars parked on the road and an increase in traffic from the proposed development would cause mayhem along this road, specifically at commuting times and especially when trying to access dinan way. It would be an accident waiting to happen. As this area is predominately a family area, lots of children play on their bikes and run around freely.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am a young teacher who is actually looking to buy their first property in Exmouth. However, I do not agree with this current plan.

Linda Bellamy

Full name: Linda Bellamy

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Land to the South of Littleham (Exmo_17) - I object to this as traffic already bad at liverton roads bad we have sewage problems not enough doctors dentist and secondary school this is insane I live in littleham we don't want more cannot get out if Capel lane now without more cars added to it it's a disgrace

Elise Belsher

Full name: Elise Belsher

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Gerri Bennett

Full name: Gerri Bennett

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at EXmo 20 should be located at an alternative site where Pebblebed Heaths would not be harmed. Developing EXmo 20 is contrary to policy PB01 of the local plan and thus is not in accordance with the mitigation strategy. EXmo 20 would entirely destroy the tranquility, wildness and dark skies of the countryside contrary to Policy OL01, Developing this area would isolate and fragment habitats destroying wildlife corridors (paragraph 13.23 of the local plan). Veteran trees and species rich hedgerows would be destroyed across the site. It would increase traffic and the need for car travel and is unsustainable development. It is isolated and people would need to travel more than 800m to access services. It is closer to Budleigh Salterton services than Exmouth making it a first choice rather than Exmouth putting pressure on all the local services there. This would also be contrary to policy OL05 of the local plan.

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

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

Peter Montgomery & Elaine Bennett,

Full name: Peter Montgomery & Elaine Bennett,

Proposal:

5. Development in the Towns and Villages

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Our main objection to the proposed developments in Whimble are road infrastructure, both to and through the village, which are very dangerous particularly to pedestrians, cyclists, horses etc and any increase in population will only exacerbate this problem. A footpath through the orchard north of Whim 08 is hardly going to change the situation. The road infrastructure in Whimble is similar to Branscombe - a long pavement-less lane both to and through the village and as far as I can find out just ten new homes were proposed for Branscombe in 2016 (and that's too many.) If they laid a new road with pavements from Hand and Pen (old A30) connecting the south and north of the village that should satisfy our main health and safety concerns but we would be losing our green wedge as well as prime agricultural land and it would be undoubtedly harmful to wildlife. As deer use the green wedge to commute between north and south Whimble, it's essential to maintain a buffer between Cranbrook and Whimble.

Lynda Benson

Full name: Lynda Benson

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development will add at least one car per property creating further build up of traffic on the B3179 travelling to Exeter, Exmouth and Budleigh Salterton. It will lead to coalescence of Budleigh Salterton and Exmouth neither of which has the infrastructure to absorb such an influx of permanent residents and of course is contrary to POLICY OL05

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Unless the schools, hospital, roads, parking, roads and services are significantly improved I cannot support such a large development which will cause general havoc to existing residents. Our sewers already cannot support the influx of visitors in the holiday season causing sewage to be closing our beaches (surely the reason to be here) and I would expect these important services to be made ready before any further developments can be considered. Furthermore the wildlife would suffer, and the pebble beds are supposed to be protected. How can this even be on the table?

Christine Bentley

Full name: Christine Bentley

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This isolated site is nearer Budleigh Salterton than Exmouth. BS is far smaller than Exmouth & has very limited services as it serves only 5000 people Schools/ Health Services, Parking Infrastructure -sewage ALREADY consistently being dumped in sea at BS from both towns. Access via mere winding country lanes. Damage to Pebblebeds with rare flora & fauna -some protected species 9SSSI/SAC/SPA/NNR Saxon settlement St Johns area. Flood risk known & in conflict with AR01B Contrary or conflicting with Policies OL01,(dark skies) OL09, PB04, (habitats) Conflicting with Strategic Nature Area 368 - contrary to Para 13.23 and 13.9 of the Local Plan MAIN ACCESS opposite SAC/SPA Too dangerous for walking or using 2 wheel vehicles safely on these narrow, undulating, winding, country lanes -so more bad accidents and far more traffic just to reach & leave the site contrary to Para11.2 & 11.6 Local plan and POLICYTR01. Say 2 cars per house - school runs -the lanes will be of non-moving traffic for hours per day

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from Local Plan Reduce size at worst. No access to be from B3179 or SouthernWood Revert to previous proposla

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

Kate Bergin

Full name: Kate Bergin

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL01

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: 2) Destruction of acres of arable farmland and beautiful countryside : This humongous “new development” is quite frankly totally inappropriate for our beloved verdant county of Devon!! Given the substantial areas of outstanding natural beauty within the county, why is it expected to build the same number of houses as larger, more developed counties? Acres and acres of beautiful, rural countryside will be concreted over and destroyed forever! We all agree on housing needs but in the appropriate places with brownfield sites prioritised first. Local wildlife, ancient trees, arable farmland, hedgerows, natural fauna and habitat will be lost. Nature is vital for the survival of our planet and extremely important for our mental and physical wellbeing. The labelling of this new town as “sustainable” is farcical! It will be destroying everything that is good and then putting back tiny pockets of green! We are custodians of our planet and owe it to future generations to preserve our environment and natural heritage not partake in its very destruction!!

Full name: Kate Bergin

Proposal: 15. Our Outstanding Historic Environment

1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HE01

3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Historic Environment chapter is not sound. Please be as precise as possible.: 3)

Local heritage destroyed : The sleepy hamlet of Farringdon is steeped in history and contains many listed buildings, a beautiful church and an active community of residents who moved here for peace & quiet but who will suddenly find themselves in the midst of a new town with thousands and thousands of new residents. There must be appropriate and substantial green wedges that clearly define where the village of Farringdon ends and the new settlement begins. From what I can see in the draft proposals, the new settlement will be superimposed on top of the already existing village of Farringdon with absolutely no regard whatsoever for it's residents.

Full name: Kate Bergin

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP07

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: 4) No infrastructure : There is absolutely no infrastructure in place to cope with such a vast new population. No roads, no railway, no bus routes, no sewage. There are no medical facilities here and thousands of additional people will totally flood an already overwhelmed medical system.

Paul Bergin

Full name: Paul Bergin

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: 4) Protect Farringdon a) this new town effectively swallows up 50% of what is Farringdon Parish today b) what will remain of Farringdon should be protected - a significant open space (of grass, trees, water and not simply some narrow strip) between where the new town ends and what remains of Farringdon is essential

Full name: Paul Bergin

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: 1) New town Decision Process a) this is a new town, eventually comprising 10,000 dwellings (not a “small development”) b) the location is driven purely by “call for sites” results c) when asked to visit Farringdon to view the New Town proposed location, the SPC declined d) this New Town is located right next to partly completed Cranbrook, another New Town project e) the developers describe it as an “Exeter extension” and these two new towns combined massively increase the size of Exeter - by circa 40%

Should the location of a New Town be driven primarily by a call for sites? This project is so significant, should decisions be taken at a higher (regional / national vs local) level? No appropriate infrastructure is in place (or currently planned) to cope / there is no railway line or likelihood of one.

Full name: Kate Bergin

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As a Farringdon resident myself, I am aghast at the total lack of long term vision of this project and the apparent disregard for our existing and thriving community. Nobody has come to visit us or allow us to voice our concerns. I hope my comments will be given due consideration and not fall on deaf ears.

Full name: Kate Bergin

Proposal:

7. Adapting to Climate Change

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR01

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: 5) Flooding
: We already experience a lot of flooding in rainy weather (run off from fields etc) and mass local building will only make matters worse.

Anthony Bevan

Full name: Anthony Bevan

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.4

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: Because it says its about a Cranford local plan NOT the subject which is supposed to be the introduction to the East Devon plan

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

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

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: it is not the correct plan

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

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

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: because it is the wrong introduction

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

Sarah Bevan

Full name: Sarah Bevan

Proposal:

5. Development in the Towns and Villages

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

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

5.8

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

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal to recommend Sidm-31 is completely unsound. This was correctly rejected in the current adopted plan and nothing has fundamentally changed.

By your own admission it was correctly rejected again this time round but added almost half heartedly because of representations by the current owner/developer. It is in the AONB designated area (now called National Landscape) and outside the current built up area boundary. It should remain so to protect the landscape and countryside from unnecessary development. It is by your own admission within the proposed green wedge (currently within the 'Sidbury-Sidford Non-Coalescence Area' in the 'made' Sid Valley Neighbourhood Plan).

The landscape value is Very High and with High/Medium landscape sensitivity. It is incorrect to say that access is good It is not. Burscombe Lane is a narrow country lane past the site with no ability even for cars and pedestrians to pass on the Lane, and then has a very narrow section with no footpath which is not wide enough for even medium sized commercial vehicles. These have to stop beforehand and unload into smaller farm vehicles to get past the narrowest part.

The Sidmouth site selection report says a possible second access site could be into Windsor Mead. However there is no current access and it would require the loss of gardens from 2 houses. In any event Windsor Mede is itself a reasonably narrow road with very poor access onto the main coast road, having very poor visibility to both right and left which cannot be improved because of the height of the land on each side of the junction.

In addition there can be no justification to extend the built up area boundary and build further into the National Landscape when there are other infill sites in Sidmouth within the built up area boundary.

For example the main reason for rejection of site Sidm-22 was that part of the site was currently used for Employment purposes. However the north part of the site is not built on and only sparsely used for storage. combined with part of Sidm_20 this area could be developed for housing with good access onto the main road and with far less restriction on the height and type of housing.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To make it sound it needs all reference to Sidm-31 being removed from the paragraph 5.8. The reasons being set out at 3(b) above

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

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

be as precise as possible.: the Site selection report admits the site has not been through the Housing and Economic Land Availability (HELAA) process and therefore does not have proper and adequate comments from DCC Highways or DCC Education. Furthermore I cannot see that it has been adequately and fully consulted with Environmental protection.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure a proper review of the site has been undertaken

Full name: Anthony Bevan

Proposal:

5. Development in the Towns and Villages

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

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

5.8

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This area is part of the ED AONB and it cannot be right to destroy this environment by when other unused land that is not part of the AONB is available. It would also be unacceptable to build on this land which is prominent in the local landscape

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: For the reasons given at 2 (b) above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Delete all reference to this para. If there is a need for the provision of 15 houses in the plan then find another area which is not part of the AONB such as the field between Bickwell valley and Boughmore Rd.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: because it does not comply with the need for environmental protection

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because we need to ensure the protection of the AONB

Jan Billington

Full name: Jan Billington

Proposal:

5. Development in the Towns and Villages

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

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

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

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

EXMO_20 will destroy the 'tranquility, wildness and dark skies' of the countryside and is contrary to POLICY OL01. EXMO_20 is in conflict with POLICY OL09 and POLICY PB04.

It would absolutely require the need for car travel as the nearest town is Tier 3 Budleigh Salterton which has no train station, secondary school or even bank! It is in conflict with Paragraph 11.2.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site needs to be significantly reduced in size as previously recommended and accessed via Dinam way so as not to take vehicle access onto the boundary of the SSSI>

Full name: Jan Billington

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: EDDC are ignoring national regulations to meet "minimise need to travel and provide access to sustainable transport" net zero targets by building EXMO_20 in an area where the nearest town is 2 miles away tier 3 and has no railway station and inadequate buses. There is no option but to use cars in these circumstances for all amenities.

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: EDDC are ignoring national regulations to meet "minimise need to travel and provide access to sustainable transport" net zero targets by building EXMO_20 in an area where the nearest town is 2 miles away tier 3 and has no railway station and inadequate buses. There is no option but to use cars in these circumstances for all amenities.

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

relevant policy or paragraph. Please be as precise as possible.: Put vehicle access for this huge development at the bottom of the site closest to the railway station.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Putting huge developments in total isolation from major transport hubs and facilities forces adults and children into cars for work and school runs and to visit all but the most basic amenities. The SSSI site which the entrance to this EXMo_20 abuts will suffer with resulting vehicle pollution.

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

Full name: Jan Billington

Proposal:

5. Development in the Towns and Villages

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

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

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

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

EDDC introduced this previously rejected site between Regs 18 and 19 and have not consulted on it. EXMO_20 has been rejected by HALAA and by EDDC own planning team. The development site abuts the boundary of the Ward of Budleigh and Raleigh. It is only 1.5 miles to Budleigh Town which is the only town within the National Landscape and a Tier 3 town with no secondary school, a full Primary school , no Bank and no rail links. EDDC seem to think this it is appropriate locations for 700-1000 homes. The only vehicle access onto the B3179 is dangerous and right against one of the SSSI top three sites in Europe. It could not have been more ill conceived on many levels.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to previous EXMO _20B

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Budleigh Salterton Town Council chair of planning was given 3 minutes consultation at the strategic planning meeting and requests for inclusion and consultation have been ignored. Two district councillors who have attempted to raise objections have been told that “it is a done deal”. This is NOT how consultation works.

This development is contrary to numerous policies and should not have been pushed through against policy advice. It contravenes OL01; OL09< PB04, HE02; TR01, OL05 etc etc.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Budleigh Salterton has been completely side lined in this whole process to a shocking degree.

Jane and Christopher Bingham

Full name: Jane and Christopher Bingham

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The following are concerns regarding the proposed Travellers' Site, Langaton Lane/Tithebarn: Is this site appropriate as the majority of the site is on a flood plain? The site opposite was opposed for houses due to the noise and proximity of the motorway. Travellers' Sites should comply with the same rules as for house building. The lane approaching site often floods. Travellers who use these sites often want a long-term placement for their children. All the schools in the catchment area are full. This would involve travelling to Exeter unless schools are required to save space for Travellers' children. Does this disadvantage the non-traveller community or do schools go above their allocation? How would this impact on the huge number of youngsters coming into the area with all the house building which is taking place? I understand that all children must have access to education but with this area inundated with youngsters what plan are being formed to deal with the influx? There is a shortage of spaces for Travellers in this area. Cannot a larger site be created in the new plan between the A30 and Topsham? If this proposed site goes ahead will the £600,000 which was set aside by East Devon for said site be used to place a manager on site to monitor the usage and maintenance? What about the Sowton site? The lane has been virtually traffic-free for a few years and is used by many pedestrians, cyclists, young children on scooters and bikes and with the increased traffic, if the proposed site goes ahead, what safety measures would be put in place to guarantee safe walking, cycling, etc. The corner at the top of the lane from the main road would need straightening in order for walkers coming from the Monkerton side to see traffic turning into the lane.

Jerry Bird

Full name: Jerry Bird

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Firstly, this is a hugely in-depth and crucial consultation for our district, particularly for those of us at the West End, the future depository for practically all building development, but even appreciating that fact, the Commonplace approach is not user friendly, it's too 'clunky' and the sheer scale of included information is quite overwhelming. Even for those of us with a modicum of IT skills and common sense, navigating around the various documents and expecting the General Public to have Planning Officers' knowledge in order to cite justification for or against policies etc, and by which legislation it's being supported or objected to is frankly ludicrous! The New Community / Infrastructure / Sustainability Although the consultation has lasted six weeks, I think it would take that time, full time that is, without day jobs and other life commitments, to come close to understanding fully every strand of policy, legislation and requirement to complete the Commonplace questions with any conviction that 'input' was factual and / or correct. No wonder, considering the population of East Devon, only a small percentage of people bother, which suggests that by design it aids the process by keeping numbers low, manageable and the process for pushing things through easier. There is already a perceived lack of trust in the use of the Commonplace portal and how the information is used to produce credible results. Also, it was noted that despite the consultation being open until 31st March, the online portal had closed by 1000, not 1700 or even 23.59 hours which still encompasses the 31st March. Although, like the majority of locals in the affected Parish of Farringdon, I am totally against the crass scale of proposed development being planned for our small rural community, it is vitally important that EDDC engages directly, and sensibly, i.e. regular face to face engagement, with the community to help drive forward a plan that will safeguard the existing dwellings and welfare of those affected. The whole process of how the site was selected / ratified and the SPC's refusal to actually visit the site to see for themselves the environment which would be destroyed was particularly disappointing, even when invited towards the latter stages. We do not wish to experience that kind of sidelining / dismissive attitude again, particularly when the majority of the SPC Councillors have no connection to the West

End of the District, therefore it being of no consequence to them / their Wards. Appropriate thought must be given to what the new community will be called, with the sympathetic engagement of local opinion. The name Denbow has been bandied around, but this is not appropriate. Allow the people of Farringdon, Clyst Honiton and Clyst St Mary have the input, not outsiders, and certainly not developers.

By its own Ward Councillor's estimation, Cranbrook is approximately 15 to 20 years away from being finished, and everyone is too well aware of the mistakes and issues associated with its development. They continue, primarily as the various developers are in the driving seat and dictate what they wish to build and when, particularly when it comes to affordable housing. 13 years on and the so-called Town Centre is still under development. Despite all of this, a second new development will commence development. The West End building site will be in continuous operation for a number of decades to come. What a nightmare for locals to endure, a blight on our environment.

It is essential that before the first houses are built, all required and proper infrastructure must be in place first, learning from the flawed Cranbrook model. That includes all water / sewage, power, access connections and an indication that appropriate medical, dental, educational facilities are included as a must. Whilst they cannot be forced, there are seemingly no incentives to encourage the NHS to provide surgeries / clinics or dental practices etc within such a development, but by the same token no help is given to the existing facilities to cope with unprecedented demand from Tithebarn and Cranbrook, a recent open letter from the Pinhoe and Broadclyst Surgery raising this very issue. It's unacceptable to further burden the extremely overstretched existing facilities, hence again reiterating the point that whoever ultimately drives this development has the responsibility to ensure infrastructure requirements are met, prioritising local needs and not developers' greed.

South West Water have proven to be particularly inept at managing their current level of infrastructure and have caused numerous pollution issues as a result. What safeguards are in place to ensure that water and sewage facilities will cope and be managed correctly for the size of the proposed development without impacting adversely (siting, odours vehicular movements etc) on the existing community? Likewise with DCC Highways, totally unable to manage and maintain even a small percentage of its existing road network, lacking in appropriate budget, yet in time additional access roads will be constructed for the new community, and over time an additional 20,000 extra vehicles added to the road network which is at breaking point now, specifically the A30 towards Sowton and the A3052 towards Sandygate. There is no planned rail link, public transport

will be problematic and cycle routes will primarily be for fair weather use, the latter two currently being experienced by Cranbrook, as cited by its Ward Councillor.

Sufficient and non-negotiable levels of affordable housing must be included. If 20 or 30 % is the required amount, then that's what must be delivered, without later developer reductions because their profit margins are affected. That is not an acceptable argument! Affordable houses must be available for locals first, resident local families who would wish and expect to continue to live and work within their home area / community, and not be forced away due to inflated house prices akin to those of South East England etc. Bulk buying of properties by other 'outside' authorities to rehouse and rehome residents from their areas must not be permitted. Otherwise, a false migration is created, with locals being forced away to buy and residents from other areas being moved in. Where is the sense in that!!??

So, despite the wider populace knowing otherwise, will this new community be guaranteed to be sustainable as envisaged by EDDC? Will it just become a dormitory town for Exeter, something which was again acknowledged as a possibility by EDDC's Assistant Director of Planning? It appears, despite the glossy brochures, EDDC is planning for one thing, but the reality, much like Cranbrook, could be very different.

Environment

Nothing has been really done to safeguard agricultural activities, and the proposed new community will see the loss of at least 500 hectares of good agricultural land, and its environment, flora and fauna etc. Potentially it does not stop at 'just 500 hectares', especially if future expansion is required towards Woodbury and Clyst St George as indicated by EDDC's own Assistant Planning Director when pressed at previous SPC Meetings. At a time when food costs are escalating, farmers are being squeezed and arable land continues to be lost to overbearing mass development, our agricultural land must be protected. Sufficient land availability must still be considered for appropriate levels of food production. Farming is one of the primary industries within Devon as a whole, Devon being a rural County, a green County, but it is being continuously squeezed out.

With regard to the new community, the distribution of green areas within the proposed area must include proper buffer space, at least 100 metres, between / around existing

dwelling and any proposed new building, whether it's infrastructure or domestically related. Existing boundaries of dwellings must be safeguarded and recognised, i.e. trees, hedges etc not 'accidentally' removed by developers because it affects their plan. The unwanted encroachment towards, against the existing Farringdon is causing a great deal of anger and anxiety amongst residents, particularly where Water Treatment, Cemetery and Solar facilities are possibly being located. In respect of the latter, rather than waste land by covering it with unsightly solar panels, why not ensure / mandate that each building must have solar panels on its roof? If you're pushing to be eco / environmentally friendly then would that not be a sensible requirement? Leave designated Solar Farm land as simply green, plant trees and or wildflower meadows instead. Had proper consideration been given to the siting of large solar farms so close to Exeter Airport, a potential safeguarding issue re. Aviation safety, e.g. large areas of reflective surfaces close to the Airport and within its local traffic pattern?

A cap on any further industrial development must be included. Hill Barton and the smaller Waldrons Estates already exist. No further expansion of their existing footprints is necessary. No additional industrial estates are required, especially with the multitude already within the West End of the District, and further areas being earmarked for such development i.e. near the Airport etc.

Future Oversight

The planned devolution and EDDC ceasing to exist in three years time, is a concern with respect to the validity of The Local Plan thereafter. It had been hoped that EDDC would see this through, but under devolution it'll come under a Unitary Authority. Will that Authority have the same power, influence or will it just be token input allowing developers to do as they please with Central Government's backing? Whilst appreciating any new Authority must initially adopt The Plan, I understand that it can be reviewed at the five year stage and essentially changed to suit future housing requirements, which potentially means even more mass development. What safeguards are in place to ensure that the Plan will be future proof and will be maintained for its full term at least?

Judith Anne Bishop

Full name: Judith Anne Bishop

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Despite the best intention of all concerned with the planning proposal to make the development climate friendly by encouraging walking and cycling commutes into Exmouth, we all know that in this current environment with all the time constraints everyone has, no one has the time to contemplate these methods of transport and vehicles will be used in large volumes.

There has been a lot of surveying carried out in the area recently. It seems inconceivable that it looks like professional surveyors have turned a blind eye to the potential traffic problems this current access road proposal would cause! As you will see there are two access areas into Meadow View Road off Dinan Way. The entrance nearest St Johns Road has a very small access road leading into Meadow View Road before you reach a give way T junction with traffic approaching from both sides along Meadow View Road to gain access to Dinan Way via this small access road. Turning right from this T junction towards the entrance of Southern Wood it is plain for all to see that residents park vehicles on one side of the road resulting in single track traffic with a few passing places. This would not work with a projected increased volume of through traffic for 1,000 houses. It could possibly cause back ups on Dinan Way waiting to turn into this access road when vehicles come to a stand still at the T Junction to give way on Meadow View Road.

Turning into the second entrance into Meadow View Road does provide a flow of traffic without hitting give way signage. However, again, it cannot be missed that residents park their vehicles on the roadside which narrows access to single track traffic with a few passing places. Both these situations would cause problems with emergency services seeking entrance to the new development via Southern Wood. The proposal being made should be raised with the emergency services. Turning to Southern Wood itself, which is considered as an access to a new development, it is a narrow residential cul de sac road purposely built to serve 12 properties. The proposal to make this a thoroughfare for over a 1,000 houses will disturb the ecology of the wood with the increased movement, noise and pollution from a large volume of vehicles. It will have a detrimental and devastating affect to the protected wildlife that use this woodland.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There are alternative solutions which could be considered for access to this development. There is a road to the new development already established off the Salterton Road through Liverton business park. Traffic lights as at the top of DinanWay would make access to and from the development safe. Alternatively a new link road could be built further along Salterton Road just past the Pink Houses exclusively for access to the development.

Full name: Judith Anne Bishop

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: It is outrageous to think that woodland that has been on the edge of Exmouth for hundreds of years is being considered as a route through to the proposed development. It would appear that a proportion of the woodland would be subjected to destruction to make way for a new road which would affect the whole ecology of the woodland.

The protected wildlife that this woodland serves houses many species and includes Otters, Bats, Magpies, Collared Doves, Woodpeckers, Wood Pigeons, Owls, Falcons, Rooks, Crows, Deer and Dormice, all seen in the garden of 6 Southern Wood! This needs to be brought to the attention of the appropriate authorities. All species have lawful legal protection through the appropriate legislation/Acts . Work has already been undertaken in the felling of trees in the area at the end of Southern Wood where the access road would cross the watercourse, presumably to assist with surveying. Has this been done legally?

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Our property is at the end of the cul-de-sac and has a Withycombe Brook running along the

edge of the boundary. Having lived at the property for nearly 40 years the bank of the watercourse has had no problems until the last 6/7 years where the volume of the water flow has severely increased to the degree that it is now causing extensive damage and erosion to the banks. No doubt the UK's climate changing weather patterns contributes to this due to the excessive run off of rain water from the adjacent fields proposed for development. The damage became so extensive that in June 2021 contact was made with the Environment Agency to discuss options in preparation to control the increased water flow adjacent to our property. There are other properties that have their boundary adjacent to the watercourse who will require bank protection.

How can the consideration of further extensive rain water run off, through a very large housing development, be considered which would lead to further increased volumes of water flow through the winter months? The area around the watercourse is in a designated flood zone with bank erosion now taking place. Should this development proceed the residents would seek financial assistance to meet the cost for work to protect the banks from the increased water flow volumes that would occur. This problem could be a major concern for flood risk with the full length of the watercourse banks being unprotected down stream from the site of the development.

It is our intention to contact the Environment Agency to obtain their views and seek advice on this situation.

Everyone is already aware of the infrastructure problems that Exmouth is experiencing and yet Budleigh is by far closer to the development than Exmouth Town. Both towns would require infrastructure investment to cover the lack of schools, Doctors surgeries for health appointments, major sewerage problems, road infrastructure to name a few of the problems that are now existing and will be made worse by further development. We feel that the Council is being held to ransom by the Government with threats that do not consider the wider effects and implications that this will have on Exmouth and Budleigh and somehow needs to be addressed politically.+

Full name: Judith Anne Bishop

Proposal:

5. Development in the Towns and Villages

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

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

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

Further to my email sent on 28/03/2025 10:20 raising objections to the proposed Exmo_20 development a group of residents have carried out further research which the content needs to be raised as objections to the proposed Exmo_20 development.

objection1 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.

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 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. Objection 3 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. Objection 4 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.

Objection 5 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 2024 Strategic Planning Committee meeting should be selected for allocation as an alternative to Exmo_20.

Objection 6 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 Pebblebeds Heath.

Full name: Judith Anne Bishop

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 It is outrageous to think that woodland that has been on the edge of Exmouth for hundreds of years is being considered as a route through to the proposed development. It would appear that a proportion of the woodland would be subjected to destruction to make way for a new road which would affect the whole ecology of the woodland.

The protected wildlife that this woodland serves houses many species and includes Otters, Bats, Magpies, Collared Doves, Woodpeckers, Wood Pigeons, Owls, Falcons, Rooks, Crows, Deer and Dormice, all seen in the garden of 6 Southern Wood! This needs to be brought to the attention of the appropriate authorities. All species have lawful legal protection through the appropriate legislation/Acts . Work has already been undertaken in the felling of trees in the area at the end of Southern Wood where the

access road would cross the watercourse, presumably to assist with surveying. Has this been done legally?

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

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

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. Our property is at the end of the cul-de-sac and has a Withycombe Brook running along the edge of the boundary. Having lived at the property for nearly 40 years the bank of the watercourse has had no problems until the last 6/7 years where the volume of the water flow has severely increased to the degree that it is now causing extensive damage and erosion to the banks. No doubt the UK's climate changing weather patterns contributes to this due to the excessive run off of rain water from the adjacent fields proposed for development. The damage became so extensive that in June 2021 contact was made with the Environment Agency to discuss options in preparation to control the increased water flow adjacent to our property. There are other properties that have their boundary adjacent to the watercourse who will require bank protection.

How can the consideration of further extensive rain water run off, through a very large housing development, be considered which would lead to further increased volumes of water flow through the winter months? The area around the watercourse is in a designated flood zone with bank erosion now taking place. If this development as to proceed the residents would seek financial assistance to meet the cost for work to protect the banks from the increased water flow volumes that would occur. This problem could be a major concern for flood risk with the full length of the watercourse banks being unprotected down stream from the site of the development.

It is our intention to contact the Environment Agency to obtain their views and seek advice on this situation.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. Despite the best intention of all concerned with the planning proposal to make the development climate friendly by encouraging walking and cycling commutes into Exmouth, we all know that in this current environment with all the time constraints everyone has, no one has the time to contemplate these methods of transport and vehicles will be used in large volumes.

Dinan Way has become an extremely busy road and will only increase further with the link to the A376. There has been a lot of surveying carried out in the area recently. It seems inconceivable that it looks like professional surveyors have turned a blind eye to the potential traffic problems this current access road proposal would cause! As you will see there are two access areas into Meadow View Road off Dinan Way. The entrance nearest St Johns Road has a very small access road leading into Meadow View Road before you reach a give way T junction with traffic approaching from both sides along Meadow View Road to gain access to Dinan Way via this small access road. Turning right from this T junction towards the entrance of Southern Wood it is plain for all to see that residents park vehicles on one side of the road resulting in single track traffic with a few passing places. This would not work with a projected increased volume of through traffic for 1,000 houses. It could possibly cause back ups on Dinan Way waiting to turn into this access road when vehicles come to a stand still at the T Junction to give way on Meadow View Road.

Turning into the second entrance into Meadow View Road does provide a flow of traffic without hitting give way signage. However, again, it cannot be missed that residents park their vehicles on the roadside which narrows access to single track traffic with a few passing places. Both these situations would cause problems with emergency services seeking entrance to the new development via Southern Wood. The proposal being made should be raised with the emergency services.

Turning to Southern Wood itself, which is considered as an access to a new development, it is a narrow residential cul de sac road purposely built to serve 12 properties. The proposal to make this a thoroughfare for over a 1,000 houses will disturb the ecology of the wood with the increased movement, noise and pollution from a large volume of vehicles. It will have a detrimental and devastating affect to the protected wildlife that use this woodland.

There are alternative solutions which could be considered for access to this development. There is a road to the new development already established off the Salterton Road through Liverton business park. Traffic lights as at the top of DinanWay would make access to and from the development safe. Alternatively a new link road could be built further along Salterton Road just past the Pink Houses exclusively for access to the development.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. Everyone is already aware of the infrastructure problems that Exmouth is experiencing and yet Budleigh is by far closer to the development than Exmouth Town. Both towns would require infrastructure investment to cover the lack of schools, Doctors surgeries for health appointments, major sewerage problems, road infrastructure to name a few of the problems that are now existing and will be made worse by further development. We feel that the Council is being held to ransom by the Government with threats that do not consider the wider effects and implications that this will have on Exmouth and Budleigh and somehow needs to needs to be addressed politically.+

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

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

Do not access the site via Southern Wood.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to participate to raise awareness of the issues from a direct inhabitant of the area affected.

Full name: Judith Anne Bishop

Proposal:

5. Development in the Towns and Villages

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

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

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

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

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 It is outrageous to think that woodland that has been on the edge of Exmouth for hundreds of years is being considered as a route through to the proposed development. It would appear that a proportion of the woodland would be subjected to destruction to make way for a new road which would affect the whole ecology of the woodland.

The protected wildlife that this woodland serves houses many species and includes Otters, Bats, Magpies, Collared Doves, Woodpeckers, Wood Pigeons, Owls, Falcons, Rooks, Crows, Deer and Dormice, all seen in the garden of 6 Southern Wood! This needs to be brought to the attention of the appropriate authorities. All species have lawful legal protection through the appropriate legislation/Acts . Work has already been undertaken in the felling of trees in the area at the end of Southern Wood where the

access road would cross the watercourse, presumably to assist with surveying. Has this been done legally?

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

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

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. Our property is at the end of the cul-de-sac and has a Withycombe Brook running along the edge of the boundary. Having lived at the property for nearly 40 years the bank of the watercourse has had no problems until the last 6/7 years where the volume of the water flow has severely increased to the degree that it is now causing extensive damage and erosion to the banks. No doubt the UK's climate changing weather patterns contributes to this due to the excessive run off of rain water from the adjacent fields proposed for development. The damage became so extensive that in June 2021 contact was made with the Environment Agency to discuss options in preparation to control the increased water flow adjacent to our property. There are other properties that have their boundary adjacent to the watercourse who will require bank protection.

How can the consideration of further extensive rain water run off, through a very large housing development, be considered which would lead to further increased volumes of water flow through the winter months? The area around the watercourse is in a designated flood zone with bank erosion now taking place. Should this development proceed the residents would seek financial assistance to meet the cost for work to protect the banks from the increased water flow volumes that would occur. This problem could be a major concern for flood risk with the full length of the watercourse banks being unprotected down stream from the site of the development.

It is our intention to contact the Environment Agency to obtain their views and seek advice on this situation.

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There has been a lot of surveying carried out in the area recently. It seems inconceivable that it looks like professional surveyors have turned a blind eye to the potential traffic problems this current access road proposal would cause! As you will see there are two access areas into Meadow View Road off Dinan Way. The entrance nearest St Johns Road has a very small access road leading into Meadow View Road before you reach a give way T junction with traffic approaching from both sides along Meadow View Road to gain access to Dinan Way via this small access road. Turning right from this T junction towards the entrance of Southern Wood it is plain for all to see that residents park vehicles on one side of the road resulting in single track traffic with a few passing places. This would not work with a projected increased volume of through traffic for 1,000 houses. It could possibly cause back ups on Dinan Way waiting to turn into this access road when vehicles come to a stand still at the T Junction to give way on Meadow View Road.

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Turning to Southern Wood itself, which is considered as an access to a new development, it is a narrow residential cul de sac road purposely built to serve 12

properties. The proposal to make this a thoroughfare for over a 1,000 houses will disturb the ecology of the wood with the increased movement, noise and pollution from a large volume of vehicles. It will have a detrimental and devastating affect to the protected wildlife that use this woodland.

There are alternative solutions which could be considered for access to this development. There is a road to the new development already established off the Salterton Road through Liverton business park. Traffic lights as at the top of DinanWay would make access to and from the development safe. Alternatively a new link road could be built further along Salterton Road just past the Pink Houses exclusively for access to the development.

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

Do not access the site via Southern Wood.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to participate to raise awareness of the issues from a direct inhabitant of the area affected.

Full name: Judith Anne Bishop

Proposal:

5. Development in the Towns and Villages

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

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

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

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The protected wildlife that this woodland serves houses many species and includes Otters, Bats, Magpies, Collared Doves, Woodpeckers, Wood Pigeons, Owls, Falcons, Rooks, Crows, Deer and Dormice, all seen in the garden of 6 Southern Wood! This needs to be brought to the attention of the appropriate authorities. All species have lawful legal protection through the appropriate legislation/Acts . Work has already been undertaken in the felling of trees in the area at the end of Southern Wood where the

access road would cross the watercourse, presumably to assist with surveying. Has this been done legally?

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

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How can the consideration of further extensive rain water run off, through a very large housing development, be considered which would lead to further increased volumes of water flow through the winter months? The area around the watercourse is in a designated flood zone with bank erosion now taking place. Should this development proceed the residents would seek financial assistance to meet the cost for work to protect the banks from the increased water flow volumes that would occur. This problem could be a major concern for flood risk with the full length of the watercourse banks being unprotected down stream from the site of the development.

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the ecology of the wood with the increased movement, noise and pollution from a large volume of vehicles. It will have a detrimental and devastating affect to the protected wildlife that use this woodland.

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Full name: Judith Anne Bishop

Proposal:

5. Development in the Towns and Villages

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

Do not access the site from Southern Wood.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to participate to raise awareness of the issues from a direct inhabitant of the area affected.

Karen Blackhall

Full name: Karen Blackhall

Proposal:

5. Development in the Towns and Villages

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

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

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

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

As Exmo_20 is nearer to Budleigh the services and infrastructure will not cope. It undermines the settlement hierarchy and would lead to issues contrary to POLICY OL05 of the local plan.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It would cause harm to an important wildlife habitat; Pebblebed Heath and is contrary to POLICY PB01 of the local plan and is not in accordance with the mitigation strategy

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

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

Wendy Blackham

Full name: Wendy Blackham

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The neighbourhood plan was drawn up & agreed. These sites are not on it. This is a green wedge

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not allow any more building in Lympstone and land in Lympstone that falls under Woodbury.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Lympstone has been picked on by EDDC for some reason to over build. This is a VILLAGE & EDDC are hell bent on making it a town.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The neighbourhood plan has been ignored by EDDC. The green wedge has been ignored by EDDC. Lympstone Parish Council have said no more building, the residence of Lympstone have said no more building. EDDC said sod you, we will over build and take away any village feel Lympstone has

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

Edward Blackmore

Full name: Edward Blackmore

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not legally compliant. Please be as precise as possible.: I beleive Exmo_20 is in conflict with policy TR01. As walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public ransport will do little to reduce the amount of car journeys this evelopment would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion. Southern Wood is a small cul-de-sac and with current householders parking on the road, it will be difficult for traffic to gain any access. Also Stagecoach previously ran buses through Meadow View, but had to stop due to issues with getting the buses past parked cars.

2(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I do not believe there is a way to improve access from this part of the developement and an alternative location for acces would be needed from Salterton Road.

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

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

The TR01 Policy has to propose that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development, due to the location and distance from the centre of Exmouth that is not possible.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I do not believe there is a way to improve access from this part of the development and an alternative location for access would be needed from Salterton Road.

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter fails to comply with the duty to cooperate. Please be as precise as possible.: Lack of thought to sustainable, practical, transport links

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

Lesley Blackmore

Full name: Lesley Blackmore

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Paul Blackmore

Full name: Paul Blackmore

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Full name: Edward Blackmore

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I believe Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is about 4 miles by car from Exmouth town centre and therefore detached from it; so it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible as there is not land all around it, and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable. Further more I beleive the plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

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

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

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

I believe Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is about 4 miles by car from Exmouth town centre and therefore detached from it; so it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible as there is not land all around it, and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I believe the plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

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

Julie Bladon

Full name: Julie Bladon

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Steven Blakeley

Full name: Steven Blakeley

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Carol Blyth

Full name: Carol Blyth

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 8

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: Sewage infrastructure must come first

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

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Does not mention the sewer problem

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

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

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No mention of our sewer trouble

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

Bernie Board

Full name: Bernie Board

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To remove Exmo20_from the local plan

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

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

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

Henry Bomby

Full name: Henry Bomby

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The proposed development is being built on a green wedge which must be kept protected to separate Whimple, its village and services from the huge housing developments in Cranbrook.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Proposed building area often floods and the sizing is too big, Whimple only has single track lanes in and out of the village. During primary school drop off the village is already a log jam. The village cannot accommodate an additional 50-80 more families.

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

Nicola Bond

Full name: Nicola Bond

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Dr. Chris Boorman

Full name: Dr. Chris Boorman

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I cannot understand why EDDC should be contemplating this site when it is situated next to the internationally designated Pebblebeds Heath Commons, bearing in mind the following strategy is part of the current EDDC 2013-2031 Local Plan

The Exe Estuary and Pebblebed Heaths 18.47 The Council has formed the view, after receiving advice from Natural England (the government agency responsible for the promotion of wildlife), that there is a risk that residential development (and occupants/their pet) could impact on East Devon Heaths SPA or the Exe Estuary SPA boundary. This advice is reinforced by follow-on work on Habitat Regulations assessment. A particular concern raised by Natural England is that new housing development may have an adverse effect on the SPAs; for example an increase in recreational activity and dog walking may disturb the ground-nesting birds on the Heaths or roosting or feeding birds on the Exe Estuary. Predation of birds by domestic cats is already identified as a particular concern on the East Devon Pebblebed Heaths and any increase in the number of homes could be expected to increase in cat numbers and further exacerbate adverse impacts/predation. To help preserve the integrity of the East Devon Pebblebeds Heath, specifically on account of the impacts of domestic cats through bird predation, new dwellings will not be allowed on or within 400 metres of the Pebblebed Heaths Special Protection Area.

In addition:

1. The main access point is closer to Budleigh Salterton than Exmouth - making Budleigh its most convenient and accessible town. Unfortunately, Budleigh does not

have the infrastructure (for sewage, doctors, schooling, or roads) to support such a massive influx of residents. This is contrary to POLICY OL05 of the local plan.

2. Exmo_20 would cause harm to the heritage assets of this Saxon / Norman . Medieval settlement - most significantly St John in the Wilderness Grade II listed church - contrary to POLICY HE02

3. The sewage infrastructure of Budleigh Salterton is woefully inadequate for the existing housing needs. Adding to this will cause significant additional issues.

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

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

JeromeBossuet

Full name: JeromeBossuet

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I find the housing targets too high and unrealistic for the capacities of Ottery St Mary's infrastructures. It does not reflect the local Ottery development plan with some areas that were defined as unsuitable by the local council and the population.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: With only one bridge and bottleneck at Wiggaton, road to Alington and roads to the East, traffic situation is already problematic. Some infrastructure eg the pedestrian bridge over the Otter broken for over a year and half means very dangerous for school children. GP, dentists, primary school oversubscribed, some high street shops closing, don't see the point of putting more houses. Disjointed strategy, and the well-being of population is not taken into account. Air pollution rising.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please consider realistic lower housing targets (see also housing stock) otherwise the town will lose its identity. Ottery target higher than Sidmouth, Seaton, Budleigh by far, why??

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

Jo Bowen

Full name: Jo Bowen

Proposal:

5. Development in the Towns and Villages

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to voice serious concern about any building in and around the proposed Exm-20 site. I have lived in Exmouth since 1966 and spent my professional life as a medical doctor. I now live in Budleigh (Simcoe House, 8, Fore St hill EX9 6PE) .

This plan Exm-20 is damaging for any who now call this place home. The major asset of outstanding natural / traditional farming landscape overlooking the bay and river is a really vital and treasured resource. It lies closer to Budleigh than Exmouth but affects each of these closely related towns which are both already struggling to preserve their individuality and residents' welfare.

Our rural identities here are made up of these habitats across generations. These include the wildlife and any other rural multi sensory experiences they provide - no offset, however tailored, will make up for these if lost to us.

Additionally, St John's in the wilderness is a vital spiritual resource needing its unique green environment in which to continue its particular valued and deeply historic culture. Once lost it will never be regained for future generations here. A gem will effectively be smashed .

Locals deserve to live in a place which is invested with the distinct patterned rural east Devon landscape they have already chosen or grown up with, often across many generations. Many of these people are poor in multiple social or psychological ways and many only rarely leave the area, but they derive a great nourishment from their immersion in old green walkways, views, and the distinct local nature.

The government imperative to build should therefore not entail picking on the most glorious of green farmland compartments between our 2 towns.

Thank you for considering my views, which I know thousands around here share. I also realise you are under enormous pressure to provide human housing. But, please, as I implore, not at a gross rural cost to our identities and well being.

I am copying in my MP and my local town council.

Full name: Jo Bowen

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation and for visitors alike. This is contrary to POLICY HEO. I am a psychiatrist (as well as a local resident) who has witnessed the devastating effect on people of having rural amenities stripped of their rural identities. One key part of life here is in core needs of spirituality and connection via this well established (400 years plus) and adored rural space - the church and it's green natural surrounds form part of what makes living here culturally meaningful.

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

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

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

Allen Bowen

Full name: Allen Bowen

Proposal:

5. Development in the Towns and Villages

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

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at ExMO_20 could and should be located on an alternative site where it would cause lessor no harm to the Pebblebed Heaths (SAC/SPA).DevelopingEXMO_20 is contrary to policy PB01 of the local plan and not in accordance with with the mitigation strategy. EXMO_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICYOL01. Developing EXMO_20 would fragment and isolate habitats and destroy wildlife corridors,contrary to paragraph 13.23 of the Local Plan.It would be detrimental to irreplaceable habitats,veteran trees and species rich hedgerows across the across the site, contrary to paragraph 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is currently not sufficient certainty to rule out adverse effects in integrity in relation to....air quality (East Devon Pebblebed HeathsSAC/SPA). eXMO_20 is in conflict with Policy OL09 and policy PB04. EXMO_20 would have significant adverse effects on St.John in the wilderness grade II listed church and churchyard dramatically altering three leaceful setting for worship which currently exists for the congregation. This contrary to policy HE02. ExMO_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe brook, on a sub soil of heavy clay which makes soakawayls ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through withycombe. This is in conflict with policy ARO1B.

EXMO _20 would increase the need for car travel and increase traffic congestion, in conflict with paragraph 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to paragraph 11.6 It is too far and too steep from any town centre for people to use walking or cycling as their choice of transport. This is contrary to policy TR01.

The main access point of EXMO_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High street, Doctor's school, beach etc) would be the obvious choice for residents of EXMO_20. This would lead to coalescence of Budleigh and Exmouth, contrary to policy OL05 of the Local Plan

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

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

Carolyn Bowles

Full name: Carolyn Bowles

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am very concerned to see that there are housing sites being allocated to Honiton which were not in the original consultation, particularly the site near Church Hill which I believe was originally rejected as a site for housing. This area is used frequently by local residents for walking as there is a public footpath which runs through the fields and it would be awful if these fields were lost.

The fact that it is stated in the Local Plan that one of the key points is to protect the natural environment is clearly a ludicrous statement when so much of the beautiful countryside is being lost to development, housing development is, I believe one of the worst things to affect the environment, your certainly not saving it. I would also have thought that many tourists come to Devon particularly to visit the countryside and not endless housing estates, the houses on which are crammed in for maximum profit by the developers and do not provide adequate space for gardens and parking for new residents.

The best thing that you could for East Devon would be to not build anymore housing at all, there seems to be quite a lot of derelict/empty properties about which could be restored.

All of this housing impacts on the local infrastructure, you can hardly get to see a doctor or national health dentist as it is, will you be expanding local schools, opening the hospital beds that were shut some years ago at Honiton Hospital or do we all still have to rely on the RD & E at Exeter. I know there has been talk that a new sewage works will be needed to cope with the extra waste, what about all the extra water needed to supply all these houses. How many more cars and people do you want to pack into East

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Devon, I will be surprised if there is a single blade of grass left soon. From one very displeased local pensioner who has lived her nearly all of my life.

GEORGE BOYD

Full name: GEORGE BOYD

Proposal:

5. Development in the Towns and Villages

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

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

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

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

EXMO-20 would increase the need for car travel and increase traffic congestion. it is an unsustainable development. it is isolated and people would need to travel much further than 800m to existing key services and facilities. it is too far and too steep from ant town centre for people walking or cycling.

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that the views of local people are given due consideration and decisions are not made in far off places like Manchester.

Jon Breeds

Full name: Jon Breeds

Proposal:

5. Development in the Towns and Villages

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

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

Judi Brewer

Full name: Judi Brewer

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD05

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I believe that the emerging Plan needs to be amended to ensure continued protection of our natural environment and Green Wedge and know that the present infrastructure of Seaton can in no way support further housing as stated the adopted Plan. It stated that: “community facilities, school, health, social and cultural, are seen as borderline or inadequate with no capacity to serve additional residents”. I hear many people complaining that they cannot get a doctor's appointment and one of the local surgeries has stated in the past month that they could not cope with more patients. It is also impossible to find an NHS dentist in the area; we have waited 3 months without a dentist and now have to go PRIVATE at exorbitant prices.

The adopted Plan stated in 2013 that “priority will be given to the enhancement of the environment and the promotion of business opportunities within the Town Centre to improve the attraction of the town for residents, visitors and businesses.” There is no longer any mention of enhancing the environment or supporting the town centre in the new Plan. Why the change??

The emerging Plan no longer commits to policies for the conservation, enhancement and sensitive management of the landscape and simply states: “Seaton is set within a stunning natural environment with the coast to the south, Seaton Wetlands along the eastern boundary, and the East Devon AONB located beyond to the east.” Again, why the change?

The adopted Plan states: We will restrict any further significant housing developments beyond the existing Built-up Area boundary Ensure that the integrity of the wildlife and habitats sites adjoining and near the town are not compromised.....

Extend the network of green links within the settlement and to surrounding countryside and settlements. There will be limited housing development in the short term beyond that already proposed in the regeneration area. The New Plan seems to completely ignore all of this!

Seaton has increasingly experienced flooding east of Harepath Road and at Seaton Wetlands Nature Reserve. Any development on the Green Wedge would inevitably result in further flooding of the Reserve and would put its future as a significant tourist attraction at considerable risk.

I could go on and on but lack the time. Please reconsider all these complete turn arounds which will be disastrous for Seaton and for the future of those living in this beautiful area.

Dr Paul Bridge

Full name: Dr Paul Bridge

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: The Aminster

Neighbourhood Steering Group submitted detailed comments on the sites selected in 2023. These included comments on the unsuitability of sites GH/ED/SOa, Axm_02, -08 and -09. They also asked for justification for the rejection of sites close to the route proposed for the Axminster Relief Road - see 11.10. There does not appear to be an evidence in the document that these concerns were addressed.

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

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

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As above. There has been a lack of feedback to community

Full name: Dr Paul Bridge

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: All sites selected in Axminster appear to fall within the first two SSSI impact zones for the River Axe SSSI. All drain directly or indirectly in the act but the adverse impact assessments do not appear to be consistent. On the basis of their positions in the impact zones at least medium and possibly major impacts would be expected, particularly as the SSSI refers largely to the river environment. However for most sites the impact is given as "major" in the text, but "minor" in the analysis tables.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: For SD02 the site assessments remain superficial and although they have been improved since the earlier version they require further detail work for consistency and accuracy.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am concerned as to how "joined-up" the thinking is. As with other aspects of the Plan, the impacts on the river SSSI and SAC do not relate to a single place and can only be fully considered when combined with all other potential up and down stream developments. At present I can see no inclusivity for river impacts.

Full name: Dr Paul Bridge

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: A meeting of Axminster residents identified that many were unaware of the plan details or the proposed site locations. The on-line only method for information and comment was considered ineffective and unsuitable. A significant minority of Axminster residents believe that SD02 has not been adequately consulted.

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Four of the sites listed were considered by residents as not practical or suitable (GH/ED/SOa, Axmi_02, _08 and _09). Previous applications for development on two of these sites have previously been refused and the site geography/topography has not changed. A meeting of local residents considered that site selection was not evidence-based with only superficial site assessments. These four sites are open fields on steeply sloping land that drains directly in to the River Axe through other areas of high risk of flooding. The sites all currently waterlog from October to March and the loss of water retention and run-off changes was considered a major risk. Local surface water flooding already occurs around these sites and mitigation of this is required before any further development and mitigation can be considered.

The sites selected within Axminster do not relate to the propose Axminster Relief Road (see 11.10) and sites associated with that have been rejected without apparent justification. The existing road network and drainage systems in Axminster are already above capacity and make any new development within the town or on the valley sides impractical without significant water retention and road changes. Human infrastructure

in terms of healthcare, professional services and education (there is currently no 6th form or tertiary education available) are not considered in the policy.

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

The four sites already found to be unsuitable should be removed and the site selection exercise needs to be re-visited to identify sites that could be practically developed. A properly evidence based selection needs to be undertaken with regard to the route of any future relief road, potential flooding impacts and development of the current railway service and infrastructure. This is required in order to provide practical sites and associated infrastructure, A sustainable

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: All drainage in Axminster goes into the River Axe and fills the existing broad floodplain above the tidal limit at Colyton Bridge. Any increase in river level at Axminster has implications for increased flooding around the current flood plani which includes communities at Musbury, Colyford and Colyton as well as the railway line which is already compromised by seasonal landslips between Crewkerne and Honiton. The primary catchment area for the River Axe is in West Dorset and Somerset and there is no apparent consideration of potential river level increases from development in these areas. It is not possible to accurately gauge or mitigate water levels in Axminster without detailed knowledge of upstream and downstream events. In addition to the road constraints within Axminster, both main road routes through the town (A35 and A358) are single carriageway with the exception of the Raymonds Hill-Kilminster section of the A35. Axminster residents rely on services and facilities in Exeter, Chard, Taunton and Bridport and any expansion of the town should consider the necessary improvements needed for the existing road and rail links.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I do not think that there is sufficient joined-up thinking in the current strategy for Axminster. I am concerned that site selection is not evidence-

based and appears to bear little relation to the potential Axminster relief road. I do not think that the strategy as presented is either deliverable or sustainable

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.

Peter James Briggs

Full name: Peter James Briggs

Proposal:

5. Development in the Towns and Villages

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

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

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

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

1) It seems that there is only little integration of the development plans for Budleigh Salterton, Exmouth and Woodbury and the increase in traffic that will occur. As I understand the main exit from the Exmo-20 development will probably be opposite the Exmouth Archery Club on the B3179. This road is already busy and one of the main routes through Woodbury to Exeter and the M5. it is lined with mature trees and would therefore be impossible to widen without removing them and also destroying the wildlife that resides in them. The junctions with Inner Ting Tong, Dalditch Lane and St Johns Road are hidden and dangerous when entering onto the B3179. It is recommended that a simulation of the resulting traffic flow be done before proceeding with the development.

2) The proposed development would destroy valuable agricultural land, hedgerows and woodland.

3) Climate scientists predict that we can expect much rainier conditions therefore covering large areas with roads and buildings will result in more flooding and will exacerbate the problems with overloaded sewers in Exmouth.

4) The area is flanked by protected pebble heath, home to rare wildlife and rare ground nesting birds. Increasing the population nearby will not help the protection of this area.

5) The proposal assumes that cycling and walking will be encouraged and so reduce the need for car journeys. Outer Ting Tong is some 400 ft above sea this might promote recreational walking and cycling but certainly not journeys to work, school runs and shopping.

Ann Maureen Briggs

Full name: Ann Maureen Briggs

Proposal:

5. Development in the Towns and Villages

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

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development Exmou2 is not properly integrated with the infra structure required in terms of the transport requirements. The proposal to make the exit onto the B3189 is not sensible. This is already a busy B road with dangerous intersections with western Ting Tong, Dalditch Lane and St Johns Road. The B3179 is already used by traffic from Budleigh Salterton, from Exmouth via the Salterton Road, St Johns Road on route via Woodbury, Clyst St George to the M5 and Exeter. There are also plans for large amounts of house building in Woodbury which will add further amounts of traffic and create congestion. The proposal to discourage car journeys by cycling and walking are not viable, The proposed exit opposite Dalditch lane is over 400 ft above sea level and also 3 miles to Exmouth center. There are many other reasons why the plan is not sound.] Close proximity to pebble heath Overloading the sewage and polluting the Exmouth beach. Budleigh Salterton is closer than Exmouth this will stretch its facilities for example the Doctors Surgery, the Shops and parking.

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

relevant policy or paragraph. Please be as precise as possible.: Remove Exmou_20 from the local plan or at least reduce its size. Do not access the site via the B3179

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

Full name: Peter James Briggs

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It seems that there is only little integration of the development plans for Budleigh Salterton, Exmouth and Woodbury and the increase in traffic that will occur. As I understand the main exit from the Exmo-20 development will probably be opposite the Exmouth Archery Club on the B3179. This road is already busy and one of the main routes through Woodbury to Exeter and the M5. It is lined with mature trees and would therefore be impossible to widen without removing them and also destroying the wildlife that resides in them. The junctions with Inner Ting Tong, Dalditch Lane and St Johns Road are hidden and dangerous when entering onto the B3179. It is recommended that a simulation of the resulting traffic flow be done before proceeding with the development. The proposal assumes that cycling and walking will be encouraged and so reduce the need for car journeys. Outer Ting Tong is some 400 ft above sea this might promote recreational walking and cycling but certainly not journeys to work, school runs and shopping.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo20 and do not develop access to B3179

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

Amanda Broad

Full name: Amanda Broad

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Fiona Broadbent

Full name: Fiona Broadbent

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.

- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

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

Sewage:

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

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

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.

- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

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

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the

increased development proposed for Feniton. There is now a mismatch between vision and strategy.

- Proposed development in Feniton is not ‘limited’ but huge for a tier 4 village.

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

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Access to Feni_08 would I understand be via Silverton Rise / Vineton Place, this is currently a “shared space”, the road surface is “sets” and there are no pavements, vehicular access would need to negotiate the parked cars on Silverton Rise to exit on to Broad Road. This would incur restricted vision as there are vehicles parked near the entrance to Broad Road.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If the whole draft local plan is rejected, the whole of East Devon, including Feniton could be imposed with far greater development than has been suggested. Therefore suggestions for this section are:

To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

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

Mrs Patricia Brooks

Full name: Mrs Patricia Brooks

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly close to Budleigh Salterton than to Exmouth, making BUdleigh its most convenient and accessible town. The services of Budleigh Salterton would be unable to cope with such an increase in use, particularly the Primary School which already has problems with its use of unsatisfactory temporary buildings, and the Doctors' surgery. Extra traffic in the High Street would also be a problem and also the sewage problem is ongoing. 1500 - 2000 extra people would only make this worse. The sewage problem urgently needs to be sorted out before any more new homes can be considered in this area. Exmo_20 would also have a detrimental effect on this open countryside, eliminating "tranquility, wildness and dark skies" contrary to Policy O101. Exmo_20 would increase the need for car travel, in conflict with Paragraph 11.2

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

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

MR JOHN G BROOKS

Full name: MR JOHN G BROOKS

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am not qualified to judge if it's legally compliant or not and have therefore put not.

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

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

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

Appears way out of scale with up to 700 new houses with unsuitable road links and lack of ability of local services to cope.

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I am not qualified to answer this as I don't know with whom there is a duty to cooperate, so have said no.

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

Paula Brown

Full name: Paula Brown

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site (including the common lizard, slow worms and Dormice) contrary to PARAGRAPH 13.9. The Common Lizard is confirmed to be present in the area of Exmo_20 and are protected under the Wildlife and Countryside Act 1981. Slow worms are confirmed present in Exmo_20. They are confirmed to be endangered and are therefore a priority species under the UK Biodiversity access plan. Dormice are confirmed to be present in Exmo_20. They are confirmed to be endangered and are therefore a priority species

under the UK Biodiversity Plan and protected under the Wildlife and Countryside Act 1981.

- The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to ..air quality (East Devon Pebblebed heaths SAC/SPA). Exmo_20 is in conflict with POLICY OI09 and POLICY PB04.

- Exmo_20 would have significant adverse effects on St John and the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY AR01B.

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

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

- The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services in Budleigh (High Street, Doctors, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OI05 of the local plan.

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

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To make representations in respect of the proposed developments and to ensure that the species outlined above are considered as part of the plan.

Elizabeth Brown

Full name: Elizabeth Brown

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It is notable that at the meetings attended and contributed to by residents and town representatives, sites GH/ED/27 and Otry_10 were not selected for development (for many reasons including what follows) but they have somehow been included at a later stage this prompting questions about due process. Continued as attached...

NOT SOUND. This is huge concern that sites GH/ED/27 & Otry_10 are outside of the built-up boundary and remote, from the town facilities and therefore not a sustainable location. No adequate details have been released on the special measures that need to be taken to protect ancient trees and hedgerows and no details on the measures needed to ensure safe cycle and pedestrian access to nearby facilities and Ottery St Mary town center can be achieved. In addition, so far it appears that the flood risk evaluation has been done from a desk and relies heavily on investigations carried out 10 years ago in 2015. Furthermore, there was no remedial work carried out in the vicinity after flooding affected properties in the Salston Barton area in 2008. The flood water came from the direction of the proposed development. Kings School (Ottery St Mary) and Ottery Primary School are at capacity. Coleridge Medical Centre is struggling to meet the needs of existing patients.

The EDDC has failed to respond to any questions and road safety concerns posed by local residents.

The above points are some of the major concerns but closer scrutiny of the East Devon Local Plan 2020-2042 reveal hugely concerning lapses in both due diligence and due process. Namely:

- In the current local plan this land was inserted AFTER the consultation period, and was removed when a local councillor spotted it and described it as UNDEMOCRATIC.
- In the appraisal of the development parcels around the district this parcel was NOT appraised in the same way as all the other locations especially with respect to views from the protected landscape (AONB), narrow road width, lack of pavement access, dominates existing settlement from high ground, joins up a hamlet to a town, exacerbates flood risk - these criteria INDIVIDUALLY were enough to rule out land parcels in all other locations - and inconsistencies in the utilisation of the neighbourhood plan with respect to the green wedge and the preservation of hamlets.
- During consultation EDDC were informed in person and in writing that Salston is a hamlet, and it appears in their report of the consultation process.
- The Senior Planning Officer denied knowledge that Salston is a hamlet to the Strategic Planning Committee whilst they were in committee (meaning that the public could not offer a correction for the record) - this should have been an integral part of the officers' preparation for the committee meeting and surely one of the first steps of evaluating any planning proposal.
- A member of the public raised an official complaint about the unacceptable way that the committee had been misled - the EDDC response was to accept the error and explain it as the officers cannot be expected to know everything. This is their job, they SHOULD be expected to know basic details such as this, the EDDC response was

unacceptable . If something is written in u report by the planning officers then one could reasonably expect that they might subsequently refer to it in preparation for committee.

Hypothetical. untested and unconsultcd plans for a potential pavement access were given to the Strategic Planning Committee in support of the rational

- No-one has answer d the residents of Sulston with regard to whether the development will make road -conditions more dangerous for existing residents.
- -one can provide assurances that any measures to ensure that flood risk for the re idents of al ton will not be exacerbated in perpetuity by extensive development on th lope above our houses, even if we don't take account of climate change projections, since several Salston properties have a history of flooding. Future management of flood risk management measures associated with the proposed development site (flood retention) cannot be legally enforced in perpetuity
- It is hard to feel listened to if the issues that we raise during statutory consultation both in person and in writing, are consistently ignored, as the EDDC have demonstrated repeatedly as the draft strategic planning process has progressed. This implies that consultation is treated as a necessary part of the wider process rather than an opportunity for the public to input, and this is UNDEMOCRATIC.

For residents of Ottery St Mary and Salston the above list of unexpected divergence from due process, starting with the current Local Plan, implies that EDDC strategic planning officers had decided a priori in their stated aim to 'join Salston up to Ottery St Mary' by linking Salston to the very extensive new development of Kings Reach. It is also manifestly unfair to expect Salston residents to endure further noise and disruption, even at weekends, of construction after many years more than originally planned of living nearby to construction related disruption at Kings Reach, and lesser so at Salston Manor.

Planning Inspectorate need to uphold our objections - these local plans are flawed on a number of extremely concerning levels and need to be returned for amendment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Sites GH/ED/27 and Otry_10 should be excluded from development sites allocated by virtue of the process adopted and their lacking in viability. Suitable sites for the right type of housing in the right location should be sought instead.

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There's no indication that aspirations to provide such as suitable transport networks, education facilities, sports and recreation facilities can be secured: simply requiring money of potential developers is only part of the implementation required. A comprehensive plan to achieve is required in all of this.

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

David Brunwin

Full name: David Brunwin

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmo 20 is upstream of Exmouth on the main rainwater catchment area of Withycombe brook. it is on an unsuitable subsoil which makes soakaways ineffective. it would exacerbate the already identified float risk. This is in conflict with policy ARO1B.

The main access point to XO 20 is close to budleigh Salterton. This would put a very significant increase pressure on the services and infrastructure of Budleigh. it would lead to the coalescence of Budleigh and Exmouth, contrary to policy OL05 of the local plan.

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

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

Nathan Budd

Full name: Nathan Budd

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: The Introduction chapter is not legally compliant for several reasons:

It does not adequately address the legal requirements for sustainable development as outlined in the National Planning Policy Framework (NPPF). Specifically, it fails to ensure that the proposed development will not lead to unacceptable levels of pollution, and it does not demonstrate how the plan will contribute to improving the environment. The repeated discharge of raw sewage into the sea by Southwest Water highlights a severe infrastructure deficit and environmental problem. The Introduction does not provide a credible strategy to resolve this issue, nor does it demonstrate how new development will be supported by adequate and improved infrastructure. This lack of a robust plan to address existing environmental and infrastructure failures renders the Introduction legally unsound. The lack of specific wording within the Introduction chapter detailing compliance with the Duty to Cooperate (e.g., paragraphs 1.9 onwards) is a key concern. There is an absence of explicit reference to how infrastructure delivery, especially wastewater infrastructure, is integrated into the plan's strategy within the Introduction. The general statements regarding national policy and sustainable development are not substantiated with clear commitments to addressing known infrastructure deficits.

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

forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: o make the Introduction chapter legally compliant, the following modifications are necessary:

1. Explicitly Acknowledge and Address Infrastructure Deficits:

Modification: Add a new paragraph to the Introduction that explicitly acknowledges the existing infrastructure deficits, particularly concerning sewage management, and commits to addressing these issues before further development.

Suggested Revised Wording:

"East Devon faces significant challenges in ensuring that its infrastructure can support existing and future development. There are known deficits, particularly in the capacity of the sewage infrastructure, as evidenced by the frequent discharge of untreated sewage. Addressing these deficits is a critical priority. This Local Plan commits to a strategy of 'infrastructure first,' ensuring that necessary upgrades and improvements to infrastructure, including sewage systems, are planned, funded, and delivered before new development proceeds. We will work with relevant agencies, including Southwest Water, to secure these improvements and ensure that development is sustainable and does not harm the environment or public health."

Why this modification will make the Introduction legally compliant: This addition will directly address the legal requirement to ensure that development is sustainable and does not lead to unacceptable pollution. By acknowledging the problem and committing to a solution, the Introduction will demonstrate that the plan is taking the necessary steps to meet its legal obligations under the NPPF.

2. Strengthen Commitment to Environmental Protection:

Modification: Enhance the language regarding environmental protection to include a commitment to measurable improvements in environmental quality, particularly regarding water quality.

Suggested Revised Wording:

"This Local Plan is underpinned by a strong commitment to protecting and enhancing East Devon's outstanding natural environment. This commitment goes beyond simply mitigating harm; it includes a proactive approach to achieving measurable improvements in environmental quality. Specifically, we will ensure that development contributes to the improvement of water quality and the reduction of pollution. Policies within this plan will require developers to demonstrate how their proposals will support these environmental goals, and we will work with partners to monitor and enforce these requirements."

Why this modification will make the Introduction legally compliant: This change will align the Introduction more closely with the legal requirements to protect and improve the environment. By focusing on measurable improvements, the plan will provide a clearer and more robust framework for ensuring environmental sustainability.

3. Include a Framework for Monitoring and Review:

Modification: Add a section outlining how the delivery of infrastructure improvements and environmental targets will be monitored and reviewed, with clear mechanisms for taking corrective action if necessary.

Suggested Revised Wording:

"To ensure the effective delivery of infrastructure improvements and the achievement of environmental targets, this Local Plan includes a robust framework for monitoring and review. This framework will include:

Regular monitoring of infrastructure capacity and performance, including sewage infrastructure. Tracking of key environmental indicators, such as water quality. Annual reporting to the community on progress. Mechanisms for taking corrective action if targets are not being met or if unforeseen issues arise. This monitoring and review process will ensure transparency and accountability, and it will enable the Council to adapt the plan if necessary to ensure that its objectives are achieved." Why this modification will make the Introduction legally compliant: This addition will provide a mechanism for ensuring that the plan remains responsive to changing circumstances and that its objectives are achieved. It will also enhance transparency and accountability, which are essential for demonstrating legal compliance.

These modifications will make the Introduction chapter legally compliant by:

Demonstrating a clear commitment to addressing infrastructure deficits. Strengthening the plan's focus on environmental protection and improvement. Establishing a framework for monitoring and review to ensure accountability and effectiveness. Detailing compliance with the Duty to Cooperate by providing evidence of effective engagement with relevant bodies, particularly regarding strategic infrastructure issues such as wastewater management. Explicitly referencing how infrastructure delivery, especially wastewater infrastructure, is integrated into the plan's strategy. Substantiating general statements regarding national policy and sustainable development with clear commitments to addressing known infrastructure deficits. By incorporating these changes, the Introduction will provide a sounder basis for the Local Plan and ensure that it meets its legal obligations under the NPPF.

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

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: The Introduction chapter, and the Local Plan in general, is unsound due to its failure to adequately address the critical issue of insufficient wastewater infrastructure and its implications for sustainable development.

The Introduction chapter is unsound because it fails to meet the test of being 'positively prepared' and 'justified.'

he plan does not proactively address the existing and well-documented deficiencies in wastewater infrastructure in areas like Exmouth. It does not set out a clear strategy for

ensuring that development is aligned with infrastructure improvements, nor does it acknowledge the severe environmental consequences of continued sewage discharges.

The plan's approach to development is not justified by robust evidence. It does not adequately consider the capacity constraints of the wastewater network, the environmental impact of sewage pollution, or the deliverability of necessary infrastructure upgrades within the plan period. The plan proceeds with housing allocations despite clear evidence that the necessary infrastructure is not in place or guaranteed.

This unsoundness is particularly evident in its lack of emphasis on and strategy for dealing with the wastewater infrastructure deficit, making the plan unsustainable and environmentally damaging.

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

1. Strengthen the Infrastructure Commitment:

Modification: Include a detailed section that outlines a commitment to prioritizing and delivering necessary infrastructure, with a specific focus on addressing the wastewater infrastructure deficit.

Suggested Revised Wording:

"The Local Plan recognizes that sustainable development can only be achieved with adequate infrastructure. There are significant challenges in East Devon with regards to existing infrastructure capacity, most notably in the management of wastewater. To

address this, the plan adopts an ‘Infrastructure First’ principle. Development will be strictly contingent on the delivery of necessary infrastructure improvements. This includes a commitment to work with Southwest Water and other relevant agencies to secure funding and implement a program of upgrades to wastewater infrastructure. The Introduction will also detail how the delivery of infrastructure will be monitored, and how shortfalls will be addressed to ensure that development does not proceed without the necessary infrastructure in place."

Why this modification will make the Introduction sound: This will provide a clear and strong commitment to addressing a critical infrastructure deficit. It will demonstrate that the plan is not only aspirational but also grounded in a realistic and deliverable strategy.

2. Enhance the Duty to Cooperate Explanation:

Modification: Expand the section on the Duty to Cooperate to provide specific examples of how the Council has engaged or will engage with relevant bodies, particularly concerning strategic infrastructure and environmental issues.

Suggested Revised Wording:

"East Devon District Council is committed to fulfilling its Duty to Cooperate. This commitment is central to addressing strategic issues that cross administrative boundaries. The Council has engaged and will continue to engage with [list specific bodies, e.g., Southwest Water, Environment Agency, neighboring authorities] to ensure that the Local Plan effectively addresses strategic matters. This cooperation includes joint working on the planning and delivery of strategic infrastructure, including wastewater management solutions, and coordinated approaches to environmental protection and enhancement. The Introduction will provide further detail on the mechanisms for ongoing cooperation and how the outcomes of this cooperation have shaped the plan."

Why this modification will make the Introduction sound: This will demonstrate that the plan is based on effective collaboration and that strategic issues have been properly considered and addressed through joint working.

3. Provide Measurable Targets and Monitoring Framework:

Modification: Include a section that outlines how the plan's objectives, particularly those related to infrastructure and environmental improvements, will be monitored and measured, with clear targets and mechanisms for review and corrective action.

Suggested Revised Wording:

"To ensure the effective delivery of the plan's objectives, the Introduction establishes a framework for monitoring and review. This framework will include:

Specific, measurable, achievable, relevant, and time-bound (SMART) targets for infrastructure delivery and environmental improvements, including targets for the reduction of sewage discharges. Regular monitoring of key indicators, such as infrastructure capacity, water quality, and environmental quality. Annual publication of monitoring reports to ensure transparency and accountability. Mechanisms for reviewing the plan and taking corrective action if targets are not being met or if new challenges arise. This framework will ensure that the plan remains responsive and that progress towards its objectives is effectively tracked and managed."

Why this modification will make the Introduction sound: This will ensure that the plan's objectives are not just aspirational but are backed by a robust system of monitoring and accountability. It will provide confidence that the plan can adapt to changing circumstances and deliver its intended outcomes.

4. Strengthen Integration of Infrastructure in the Spatial Strategy:

Modification: Revise the Introduction to explicitly articulate how infrastructure delivery, especially wastewater infrastructure, is integrated into the plan's spatial strategy.

Suggested Revised Wording:

"The spatial strategy of this Local Plan is fundamentally linked to the delivery of necessary infrastructure. The plan directs development to sustainable locations, but this direction is contingent on the provision of adequate infrastructure. In particular, the plan recognizes the critical importance of wastewater infrastructure. The spatial strategy prioritizes development in areas where infrastructure capacity exists or can be realistically provided. It also sequences development to align with infrastructure delivery, ensuring that development does not outpace the provision of essential services. The Introduction will provide an overview of how infrastructure considerations have shaped the spatial strategy and how the plan will ensure that development and infrastructure are delivered in a coordinated manner."

Why this modification will make the Introduction sound: This will demonstrate that infrastructure is a key driver of the plan's spatial strategy, ensuring that development is located in areas where it can be supported by necessary services.

By incorporating these changes, the Introduction chapter will be significantly strengthened, providing a sounder basis for the Local Plan and ensuring that it is more likely to achieve its objectives in a sustainable and effective manner.

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

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The Introduction chapter fails to comply with the Duty to Cooperate for the following reasons:

The references to cooperation with other bodies are general and aspirational, lacking specific details of how the Council has engaged or will engage with relevant authorities and stakeholders on strategic issues.

There is insufficient detail on how the plan has been shaped by effective joint working with neighboring authorities, statutory bodies, and service providers, particularly concerning cross-boundary issues such as infrastructure delivery and environmental impacts.

While the plan mentions the importance of working with partner bodies to secure better facilities, including schools and medical services, it does not provide evidence of effective cooperation to address existing deficits or ensure that new development is supported by necessary infrastructure.

The Introduction's treatment of the Duty to Cooperate does not adequately demonstrate how the Council has worked with Southwest Water to address the significant issue of wastewater management and sewage discharges, a matter that requires strategic, collaborative solutions.

The plan highlights the importance of the new community development and its strategic implications, but it does not provide sufficient detail on how the Duty to Cooperate has been fulfilled in planning for this development, which necessitates close cooperation with various agencies and neighboring authorities.

In summary, the Introduction chapter lacks the necessary evidence and specific commitments to demonstrate that the Duty to Cooperate has been properly addressed, particularly in relation to strategic matters that require ongoing collaboration and joint working.

Full name: Nathan Budd

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: The Spatial Strategy chapter is not legally compliant for the following reasons: * It fails to adequately integrate infrastructure delivery, particularly wastewater infrastructure, into its strategic policies. While the plan acknowledges the need for infrastructure, it does not provide sufficient detail or assurance that necessary infrastructure, including wastewater management, will be delivered alongside development. * The chapter does not demonstrate effective compliance with the Duty to Cooperate, especially concerning strategic, cross-boundary issues such as wastewater management. There is a lack of evidence of joint working with relevant bodies, such as Southwest Water, to address infrastructure deficits and ensure sustainable development. * The general statements regarding sustainable development are not substantiated with clear commitments and mechanisms for addressing known infrastructure deficits. The chapter relies on aspirational language without providing the necessary detail or certainty about how critical issues, such as inadequate wastewater infrastructure, will be resolved. * The chapter's policies do not ensure that development will not lead to unacceptable levels of pollution or environmental harm. The repeated discharge of raw sewage into the sea by Southwest Water highlights a significant environmental problem that the Spatial Strategy fails to adequately address.

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

Please be as precise as possible.: To make the Spatial Strategy chapter legally compliant, the following modifications are necessary: * Strengthen Integration of Infrastructure Delivery: * Modification: Revise the chapter to explicitly articulate how infrastructure delivery, especially wastewater infrastructure, is integrated into the plan's

spatial strategy. * Suggested Revised Wording: "The spatial strategy of this Local Plan is fundamentally linked to the delivery of necessary infrastructure. The plan directs development to sustainable locations, but this direction is contingent on the provision of adequate infrastructure. In particular, the plan recognizes the critical importance of wastewater infrastructure. The spatial strategy prioritizes development in areas where infrastructure capacity exists or can be realistically provided. It also sequences development to align with infrastructure delivery, ensuring that development does not outpace the provision of essential services. Strategic policies within this chapter provide an overview of how infrastructure considerations have shaped the spatial strategy and how the plan will ensure that development and infrastructure are delivered in a coordinated manner."? * Why this modification will make the chapter legally compliant: This will demonstrate that infrastructure is a key driver of the plan's spatial strategy, ensuring that development is located in areas where it can be supported by necessary services. ? * Enhance Duty to Cooperate Evidence: * Modification: Expand the chapter to provide specific examples of how the Council has engaged or will engage with relevant bodies, particularly concerning strategic infrastructure and environmental issues. * Suggested Revised Wording: "East Devon District Council is committed to fulfilling its Duty to Cooperate. This commitment is central to addressing strategic issues that cross administrative boundaries. The Council has engaged and will continue to engage with [list specific bodies, e.g., Southwest Water, Environment Agency, neighbouring authorities] to ensure that the Local Plan effectively addresses strategic matters. This cooperation includes joint working on the planning and delivery of strategic infrastructure, including wastewater management solutions, and coordinated approaches to environmental protection and enhancement. Policies within this chapter provide further detail on the mechanisms for ongoing cooperation and how the outcomes of this cooperation have shaped the plan."? * Why this modification will make the chapter legally compliant: This will demonstrate that the plan is based on effective collaboration and that strategic issues have been properly considered and addressed through joint working. ? * Strengthen Policy SP01: * Modification: Include a detailed section in Strategic Policy SP01 that outlines a commitment to prioritizing and delivering necessary infrastructure, with a specific focus on addressing the wastewater infrastructure deficit. * Suggested Revised Wording: "Strategic Policy SP01: Spatial Strategy?New development will be directed towards the most sustainable locations in East Devon, by:?A. Focusing new development at the West End of the district, including a further new community, on-going development of Cranbrook and other major strategic developments close to Exeter. The West End is not a spatially defined policy area with a line on the Policies map, rather it is a term that applies to development proposals and site allocations referred to in this Chapter of the plan.?B. Promoting the most significant development levels, other than at the West End where the highest levels of growth are proposed, at the Principal Centre of Exmouth.?C. Promoting significant development at the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve

their own needs and that of the wider surrounding areas;?D. Supporting development at the Local Centres of Broadclyst, Budleigh Salterton, Colyton, Lymptstone, and Woodbury that meets local needs and those in the immediate surroundings;?E.

Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilminster, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble. Settlements not listed above, with the exception of Broadclyst Station which is addressed through the Cranbrook Plan, are defined as in 'open countryside' for the purposes of the Local Plan. The open countryside definition also excludes any location that falls in a defined settlement boundary or any site or area of land that is explicitly allocated or identified in the Development Plan for built development. In the open countryside more restrictive planning policies apply.?Infrastructure Delivery

Commitment: > The Local Plan recognizes that sustainable development can only be achieved with adequate infrastructure. There are significant challenges in East Devon with regards to existing infrastructure capacity, most notably in the management of wastewater. To address this, the plan adopts an 'Infrastructure First' principle.

Development will be strictly contingent on the delivery of necessary infrastructure improvements. This includes a commitment to work with Southwest Water and other relevant agencies to secure funding and implement a program of upgrades to wastewater infrastructure. The delivery of infrastructure will be monitored, and shortfalls will be addressed to ensure that development does not proceed without the necessary infrastructure in place."? * Why this modification will make the chapter legally compliant: This will provide a clear and strong commitment to addressing a critical infrastructure deficit. It will demonstrate that the plan is not only aspirational but also grounded in a realistic and deliverable strategy. ? * Include Measurable Targets and Monitoring Framework: * Modification: Add a section that outlines how the plan's objectives, particularly those related to infrastructure and environmental

improvements, will be monitored and measured, with clear targets and mechanisms for review and corrective action. * Suggested Revised Wording: "To ensure the effective delivery of the plan's objectives, the Introduction establishes a framework for monitoring and review. This framework will include: * Specific, measurable, achievable, relevant, and time-bound (SMART) targets for infrastructure delivery and environmental improvements, including targets for the reduction of sewage discharges. * * Regular monitoring of key indicators, such as infrastructure capacity, water quality, and environmental quality. * Annual publication of monitoring reports to ensure transparency and accountability. * Mechanisms for reviewing the plan and taking corrective action if targets are not being met or if new challenges arise. * This framework will ensure that the plan remains responsive and that progress towards its objectives is effectively tracked and managed."? * Why this modification will make the chapter legally compliant: This will ensure that the plan's objectives are not just aspirational but are

backed by a robust system of monitoring and accountability. It will provide confidence that the plan can adapt to changing circumstances and deliver its intended outcomes. ? These modifications will make the Spatial Strategy chapter legally compliant by: * Demonstrating a clear commitment to addressing infrastructure deficits. * Strengthening the plan's focus on environmental protection and improvement. * Establishing a framework for monitoring and review to ensure accountability and effectiveness. * Detailing compliance with the Duty to Cooperate by providing evidence of effective engagement with relevant bodies, particularly regarding strategic infrastructure issues such as wastewater management. * Explicitly referencing how infrastructure delivery, especially wastewater infrastructure, is integrated into the plan's strategy. * Substantiating general statements regarding national policy and sustainable development with clear commitments to addressing known infrastructure deficits.

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: The Spatial Strategy chapter is not sound for several reasons: * It does not provide a sufficiently robust framework for ensuring that development is sustainable and that infrastructure deficits are adequately addressed. The repeated discharge of raw sewage into the sea by Southwest Water highlights a significant infrastructure deficit that the Spatial Strategy fails to adequately plan for or address. * While the chapter includes general statements about aiming for sustainable development and aligning with national policy, these statements are not substantiated with clear, specific commitments and mechanisms for delivery, especially regarding infrastructure improvements. * There is a lack of explicit detail on how infrastructure delivery, especially wastewater infrastructure, will be integrated into the plan's overall strategy. The Spatial Strategy needs to demonstrate a clear commitment to an 'infrastructure first' approach, ensuring that necessary upgrades are in place to support new development. * The Spatial Strategy's treatment of the Duty to Cooperate is high-level and lacks the necessary detail to demonstrate how the Council has engaged effectively with relevant bodies to address strategic, cross-boundary issues, including those related to infrastructure. * The objectives outlined in the Spatial Strategy are aspirational but lack a clear implementation plan, making it difficult to assess how they will be achieved and measured. In summary, the Spatial Strategy chapter is unsound because it lacks the specificity, robust commitments, and clear mechanisms necessary to ensure that development is sustainable and that infrastructure deficits are adequately addressed.

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

Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

To make the Spatial Strategy chapter sound, the following modifications are necessary:

- * Strengthen the Infrastructure Commitment:
- * Modification: Include a detailed section that outlines a commitment to prioritizing and delivering necessary infrastructure, with a specific focus on addressing the wastewater infrastructure deficit.
- * Suggested Revised Wording: "The Local Plan recognizes that sustainable development can only be achieved with adequate infrastructure. There are significant challenges in East Devon with regards to existing infrastructure capacity, most notably in the management of wastewater. To address this, the plan adopts an 'Infrastructure First' principle. Development will be strictly contingent on the delivery of necessary infrastructure improvements. This includes a commitment to work with Southwest Water and other relevant agencies to secure funding and implement a program of upgrades to wastewater infrastructure. The Spatial Strategy will also detail how the delivery of infrastructure will be monitored, and how shortfalls will be addressed to ensure that development does not proceed without the necessary infrastructure in place."
- * Why this modification will make the Spatial Strategy sound: This will provide a clear and strong commitment to addressing a critical infrastructure deficit. It will demonstrate that the plan is not only aspirational but also grounded in a realistic and deliverable strategy.
- * Enhance the Duty to Cooperate Explanation:
- * Modification: Expand the Spatial Strategy to provide specific examples of how the Council has engaged or will engage with relevant bodies, particularly concerning strategic infrastructure and environmental issues.
- * Suggested Revised Wording: "East Devon District Council is committed to fulfilling its Duty to Cooperate. This commitment is central to addressing strategic issues that cross administrative boundaries. The Council has engaged and will continue to engage with [list specific bodies, e.g., Southwest Water, Environment Agency, neighboring authorities] to ensure that the Local Plan effectively addresses strategic matters. This cooperation includes joint working on the planning and delivery of strategic infrastructure, including wastewater management solutions, and coordinated approaches to environmental protection and enhancement. The Spatial Strategy will provide further detail on the mechanisms for ongoing cooperation and how the outcomes of this cooperation have shaped the plan."
- * Why this modification will make the Spatial Strategy sound: This will demonstrate that the plan is based on effective collaboration and that strategic issues have been properly considered and addressed through joint working.
- * Provide Measurable Targets and Monitoring Framework:
- * Modification: Include a section that outlines how the plan's objectives, particularly those related to infrastructure and environmental improvements, will be monitored and measured, with clear targets and mechanisms for review and corrective action.
- * Suggested Revised Wording: "To ensure the effective delivery of the plan's objectives, the Spatial Strategy establishes a framework for monitoring and review. This framework will include:
- * Specific, measurable, achievable,

relevant, and time-bound (SMART) targets for infrastructure delivery and environmental improvements, including targets for the reduction of sewage discharges. * * Regular monitoring of key indicators, such as infrastructure capacity, water quality, and environmental quality. * Annual publication of monitoring reports to ensure transparency and accountability. * Mechanisms for reviewing the plan and taking corrective action if targets are not being met or if new challenges arise. * This framework will ensure that the plan remains responsive and that progress towards its objectives is effectively tracked and managed."? * Why this modification will make the Spatial Strategy sound: This will ensure that the plan's objectives are not just aspirational but are backed by a robust system of monitoring and accountability. It will provide confidence that the plan can adapt to changing circumstances and deliver its intended outcomes. * Strengthen Integration of Infrastructure in the Spatial Strategy: * Modification: Revise the Spatial Strategy to explicitly articulate how infrastructure delivery, especially wastewater infrastructure, is integrated into the plan's spatial strategy. * Suggested Revised Wording:?"The spatial strategy of this Local Plan is fundamentally linked to the delivery of necessary infrastructure. The plan directs development to sustainable locations, but this direction is contingent on the provision of adequate infrastructure. In particular, the plan recognizes the critical importance of wastewater infrastructure. The spatial strategy prioritizes development in areas where infrastructure capacity exists or can be realistically provided. It also sequences development to align with infrastructure delivery, ensuring that development does not outpace the provision of essential services. The Spatial Strategy will provide an overview of how infrastructure considerations have shaped the spatial strategy and how the plan will ensure that development and infrastructure are delivered in a coordinated manner."? * Why this modification will make the Spatial Strategy sound: This will demonstrate that infrastructure is a key driver of the plan's spatial strategy, ensuring that development is located in areas where it can be supported by necessary services. By incorporating these changes, the Spatial Strategy chapter will be significantly strengthened, providing a sounder basis for the Local Plan and ensuring that it is more likely to achieve its objectives in a sustainable and effective manner.

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

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The Spatial Strategy chapter fails to comply with the Duty to Cooperate for the following reasons:

The chapter's references to cooperation with other bodies are general and aspirational, lacking specific details of how the Council has engaged or will engage with relevant

authorities and stakeholders on strategic issues. There is insufficient detail on how the plan has been shaped by effective joint working with neighboring authorities, statutory bodies, and service providers, particularly concerning cross-boundary issues such as infrastructure delivery and environmental impacts. While the plan mentions the importance of working with partner bodies to secure better facilities, including schools and medical services, it does not provide evidence of effective cooperation to address existing deficits or ensure that new development is supported by necessary infrastructure. The Spatial Strategy's treatment of the Duty to Cooperate does not adequately demonstrate how the Council has worked with Southwest Water to address the significant issue of wastewater management and sewage discharges, a matter that requires strategic, collaborative solutions. The plan highlights the strategic implications of development, but it does not provide sufficient detail on how the Duty to Cooperate has been fulfilled in planning for this development, which necessitates close cooperation with various agencies and neighboring authorities. In summary, the Spatial Strategy chapter lacks the necessary evidence and specific commitments to demonstrate that the Duty to Cooperate has been properly addressed, particularly in relation to strategic matters that require ongoing collaboration and joint working.

Full name: Nathan Budd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 8

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: Chapter 8, "Meeting Housing Needs," is not legally compliant because it proposes levels and distributions of housing development without adequately demonstrating that the necessary infrastructure, particularly wastewater infrastructure, will be available to support that development. This contravenes the National Planning Policy Framework (NPPF), which requires local plans to ensure that development is sustainable and that infrastructure needs are addressed. The chapter outlines housing targets and allocations, but it fails to provide sufficient evidence of effective cooperation with Southwest Water or a robust plan for delivering the necessary infrastructure upgrades. This lack of assurance regarding infrastructure delivery, especially concerning wastewater, renders the chapter legally unsound. The plan must demonstrate a clear strategy to ensure that housing growth does not exacerbate existing infrastructure problems or lead to environmental harm, and Chapter 8 does not provide that assurance.

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To make Chapter 8 legally compliant, the following modifications are necessary:

Infrastructure Capacity Assessment: Include a requirement within the chapter for all housing development proposals to be supported by a thorough assessment of existing

and future wastewater infrastructure capacity. Suggested Revised Wording: "Before any housing development is approved, the applicant must demonstrate, through a detailed assessment, that the existing wastewater infrastructure has sufficient capacity to accommodate the development, or that necessary upgrades will be provided in a timely manner. This assessment must be undertaken in consultation with Southwest Water."

Phasing Linked to Infrastructure: Implement policies that explicitly link the phasing of housing development to the delivery of necessary wastewater infrastructure improvements. Suggested Revised Wording: "Housing development will be phased to align with the provision of adequate wastewater infrastructure. Development will not be permitted to proceed at a rate that outpaces the delivery of necessary infrastructure upgrades. A phasing plan, agreed upon with Southwest Water, must be submitted and approved prior to the commencement of development."

Contingency for Infrastructure Delays: Incorporate contingency measures to address potential delays or shortfalls in infrastructure delivery, ensuring that housing development can be adjusted if necessary. Suggested Revised Wording: "In the event that planned wastewater infrastructure improvements are delayed or cannot be delivered as anticipated, the Council will review housing allocations and, if necessary, implement measures to restrict or slow down the rate of housing development until the required infrastructure is in place." These modifications will make Chapter 8 legally compliant by ensuring that the plan adheres to the NPPF's requirements for sustainable development, demonstrates that housing growth is contingent on adequate infrastructure, and provides mechanisms to address potential infrastructure deficits.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:

No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Chapter 8, "Meeting Housing Needs," is not sound because it sets out housing targets and allocations without providing a sufficiently robust and detailed framework for ensuring that the necessary infrastructure, particularly wastewater infrastructure, will be delivered. The chapter relies on general statements about the need for infrastructure but lacks the specific commitments, mechanisms, and certainty required to demonstrate that infrastructure deficits will be addressed and that housing development will be sustainable. The absence of a clear "infrastructure-first" approach and the failure to adequately address the known issues with Southwest Water's capacity render this chapter unsound. The policies within Chapter 8 do not provide a credible strategy for ensuring that housing development is aligned with infrastructure capacity and will not exacerbate existing environmental problems.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To make Chapter 8 sound, the following modifications are necessary:

Detailed Infrastructure Delivery Plan: Include within the chapter a requirement for a detailed Infrastructure Delivery Plan (IDP) that specifically addresses wastewater infrastructure needs. This plan should include: A clear assessment of existing capacity. Identification of necessary upgrades. A funding strategy. A delivery timetable. Responsibilities for delivery. Suggested Revised Wording: "All policies within this chapter are underpinned by a comprehensive Infrastructure Delivery Plan (IDP) that details how necessary infrastructure, including wastewater infrastructure, will be provided to support housing development. The IDP will be developed in collaboration with Southwest Water and other relevant agencies and will be regularly reviewed and updated." Infrastructure Capacity Triggers: Establish specific, measurable triggers related to wastewater infrastructure capacity that will govern the release of housing allocations. Suggested Revised Wording: "Housing allocations will be released in phases, with each phase contingent on meeting pre-defined triggers related to wastewater infrastructure capacity. These triggers will be developed in consultation with Southwest Water and will include specific metrics, such as treatment capacity and sewer network upgrades. Regular monitoring of these triggers will inform decisions on the release of future housing allocations." Strategic Collaboration Mechanism: Create a formal mechanism for ongoing strategic collaboration with Southwest Water to ensure that housing development and wastewater infrastructure planning are integrated. Suggested Revised Wording: "The Council will establish a strategic partnership with Southwest Water to ensure ongoing collaboration on the planning and delivery of wastewater infrastructure. This partnership will involve regular meetings, joint planning exercises, and information sharing to ensure that housing development and infrastructure provision are effectively aligned." These modifications will make Chapter 8 sound by providing the necessary detail, certainty, and accountability regarding infrastructure delivery, ensuring that housing development is sustainable, and that community concerns are addressed through a robust and transparent process.

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

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as

possible.: Chapter 8, "Meeting Housing Needs," fails to comply with the Duty to Cooperate because it does not provide sufficient evidence of effective engagement and joint working with relevant authorities and stakeholders, particularly Southwest Water, to address strategic infrastructure issues. While the chapter outlines housing targets and allocations, it lacks specific details on how the Council has cooperated with SWW to ensure that wastewater infrastructure capacity will be sufficient to support the proposed growth. The chapter's policies do not demonstrate that the Council has actively engaged with SWW to plan for and secure the necessary infrastructure improvements, which is a key requirement of the Duty to Cooperate. There is a lack of transparency and evidence of meaningful collaboration to address the known challenges related to wastewater infrastructure and its impact on housing delivery.

James Bullen

Full name: James Bullen

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

David Buller

Full name: David Buller

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems. It currently is NOT in my opinion. Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea. If planned development proceeds it will contravene this policy clause.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SDO1 development within Exmouth / Maer Lane STW catchment from the Local Plan. Even if it is addressed by SWW, Ofwat protocols mean that such improvements will not be completed within 8 years. To allow development of objected to locations prior to infrastructure expansion

by SWW will knowingly enable, create & add to sewage pollution of Exmouth water courses & beaches.

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

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

Exmouth is currently a town seriously lacking in adequate sewerage infrastructure, evidenced over the last few years by serial instances of ruptures of its sewage network in various locations, and with a demonstrably under capacity local sewage treatment facility, as evidenced by numerous sewage spills occurring from the network in even the slightest of rainfall. The allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan.

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

Remove site Exmo_20 from the Local Plan. The existing sewerage infrastructure in & around Exmouth is creaking. It is critical that it is not placed under additional stress by building a significant number of new homes until it has been upgraded by SWW to sufficient capacity to enable it to operate in an environmentally-compliant manner with confidence. The policy omits any reference whatsoever to the recent well-publicised issues in & around Exmouth concerning sewage treatment. EDDC have issued notice of civil emergency and a vote of no confidence in SWW because of the nationally publicised sewage infrastructure failures that have taken place across Exmouth from 2019 to 2025. To not even acknowledge this issue in the local plan, a matter of serious concern to numerous residents, despite EDDC's clear knowledge of the problems, is an abandonment of good governance & public service by the district council.

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

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: No comment

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

Julie Burdekin

Full name: Julie Burdekin

Proposal:

7. Adapting to Climate Change

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

Lindsay Burge

Full name: Lindsay Burge

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

Joanna Burkey

Full name: Joanna Burkey

Proposal:

5. Development in the Towns and Villages

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: It is unclear as to whether the draft local plan has been developed in a legally compliant way regarding Feniton. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, there was a petition signed by 500+ residents which was not taken into consideration as it was not submitted via Common Place. These important views were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians. Not everyone is able to or understands the internet and the Commonplace systems is complex to use. This is discriminatory.

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

Flooding:

- It's well documented that Feniton regularly floods. It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.

- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton and there is no evidence that it will work effectively. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30. With an increase in building this will only get worse. Developers promise their own flood alleviation schemes, but this village knows only too well how empty these are. The development at Acland Park to name one example.

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

Sewage:

- It is well known that there is not enough capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.
- It is unacceptable that people have raw sewage coming up into their bathrooms and onto their gardens.

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

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development. Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- In fact, a lot of areas mentioned have got worse. The fact that Feniton has a train station seems to be sighted a lot. However, the service has got worse since the Super Enquiry with the service being reduced to 2 hourly. This is not a service you can rely on to commute. Everyone will use their cars!
- All of the roads into Feniton are narrow with pinch points unsuitable for heavy traffic. This was highlighted during recent road closures during the FAS works, it was virtually impossible to get out of the village at times if a bus and tractor happened to meet.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity as it Kings School in Ottery
- Local GP services are at capacity.

- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

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

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.

- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village. 102 dwellings is a far greater number than the 13 mentioned above. Feniton will no longer be a village but a town with no facilities or infrastructure leading to a very poor quality of life for all of its residents

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

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single-track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two areas of single-track road passing over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion

subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principal Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References:

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

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

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

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

Sally Burnell

Full name: Sally Burnell

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is much closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services of Budleigh (GPs, school, shops, beach etc) would be the natural choice for residents of Exmo_20. This would certainly lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 for housing allocation should be selected - one which was deemed available and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA//NNR) due to Exmouth-20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance the the Mitigation Hierarchy to select avoidance over mitigation.

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

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

Exmo_02 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors, contrary to PARAGRAPH 13.24 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

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

Development of Exmo_20 on heavy clay subsoil with ineffective soakaway, would exacerbate the already identified downstream flood risk along the Withycombe Brook through Exmouth, which is also under additional pressure from climate change. This is in conflict with POLICY AR01B.

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

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

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

Ruth Burnett

Full name: Ruth Burnett

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Development of Exmo_20 on the heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR0B.

Exmo_20 would increase the need for car travel, contrary to Fig 7, the energy hierarchy, and INCREASE TRAFFIC CONGESTION, in conflict with paragraph 11.2. This would be an isolated location providing unsustainable development, as residents would need to travel much further than 800m to existing key facilities, contrary to paragraph 11.6. It is too far from any town centre to use walking (which would also entail walking along a busy roads with no footpaths) or cycling as their choice of transport. This is contrary to POLICY TR01. Exmo_20 would also have a detrimental effect on this open countryside site and the adjacent internally designated wildlife site, eliminating the tranquillity, wildness and dark skies, which is contrary to POLICY OL01.

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

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

Bruce Burniston

Full name: Bruce Burniston

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area.

EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC defied the people's wishes, and voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

This project, if successful would be yet another step in joining the urban areas of Exmouth and Budleigh Salterton. This would be detrimental to the residents and taxpayers of both.

From an environmental point of view, this project would involve the destruction of a large area of oxygen producing, carbon absorbing greenery - FOR EVER and its replacement PERMANENTLY WITH CONCRETE/TARMAC.

There are plenty of houses in Exmouth. The problem with housing supply is the profusion of holiday homes owned by richer people from elsewhere, and occupy for just a few weeks of the year. This is the result of government policies which have made investment in property the only way to preserve capital. And of course, Ministers and MPs, and many senior central and local government officials, make a lot of money out of second and third homes. Also, the larger our town becomes, the larger will be the salaries and allowances the Chief officers of the local authority will feel they should be entitled to. This brings democracy into disrepute and encourages contempt for it. Is this what East Devon Councillors want?

Furthermore:-

Do they want a single conurbation between Exmouth and Budleigh? Do they want the principle of maintaining Green Belts, National Parks and areas of outstanding Natural Beauty to be cast aside for the current government's anti-Countryside political ideology? Do they want to create a precedent for building over whatever stretches of "protected" Countryside are of interest to money making developers? Do they want local services and utilities to be overwhelmed further than they are already? Do they want more faeces in our sea? Do they want more rich outsiders outbidding our young people who want to work and live here? Do they want ordinary citizens to believe that democracy has been taken away from the people and put into the hands of politicians and officials with vested interests, including furthering their own Party ideology regardless? Do they want to cause the ordinary, law abiding, taxpaying local citizens to become disenchanted with local democracy and drive them into the hands of extremists? Do they want to harm the local tourist industry by destroying the very landscape which attracts so many visitors?

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17. It can never, ever be reversed.

Tim & Gillian Burrows

Full name: Tim & Gillian Burrows

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo-20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo-20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. Exmo-20 would fragment and isolate habitats and destroy wildlife corridors, contrary to Para 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to Para 13.9.

The Habitat Regulations assessment (30.1.25) confirms that there is 'currently not sufficient certainty to rule out adverse effects in integrity in relation to local air quality' (East Devon Pebblebed Heaths SAC/SPA). Exmo-20 is in conflict with POLICY L09 and POLICY PB04.

Exmo-20 would destroy the 'tranquillity, wildness and dark skies' of the countryside which is contrary to Policy OL01. Exmo-20 would have significant adverse effects on St John in the Wilderness Grade2 listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo-20 is upstream of Exmouth on the main catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the

already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmo-20 would increase the need for car travel and increase traffic congestion particularly as the only exit from the site for, possibly, around 1000 cars is onto a narrow B road (madness and makes no sense whatsoever). This is in conflict with Para 11.2 and is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to Para 11.6. It is much too far (and too steep) from any town centre for people to use walking or cycling (there are no footpaths/cycleways along the B3179) as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town - in spite of the well known, and growing, traffic problems in Budleigh High Street. The services and infrastructure of Budleigh (High St, Medical Centre, primary school - these 2 latter services already oversubscribed - and beach) would be the obvious choice for residents from Exmo_20. Quite apart from the obvious traffic and services chaos which could ensue, this would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20 and do not access the site via the B1379 - this would help mitigate the impact as outlined in our objections above. Ideally we would like the whole plan abandoned but, in the absence of such a sensible decision, the main mitigations above would help.

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

Melanie Burt

Full name: Melanie Burt

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

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

Pamela Burton

Full name: Pamela Burton

Proposal:

5. Development in the Towns and Villages

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

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

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

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

1. South West Water cannot and does not provide adequate sewage systems at the present - they are all overloaded and antiquated.

2. The access road onto the B3179 opposite the archery club - no reasonable or intelligent traffic survey has been carried out. One only has to look at a Bank Holiday Monday with a car boot sale at the Archery Club to observe considerable traffic jams in both directions. Considering 700 houses would probably generate at least 1000 cars the road could not take it. Too narrow, poor quality surface - the road is also used for heavy goods vehicles heading into Budleigh as well as the local recycling centre. Local facilities are inadequate to accommodate an increase in usage. Because of the access people would gravitate towards Budleigh - the current local primary school, which is already over subscribed, will be inundated. The Doctor's surgery, also over subscribed, will not be able to cope. The local chemist, recently reduced to one, is already very busy at any time. Public conveniences are very limited in Budleigh as are car parking spaces. There is no indication of how much of the housing might be for affordable or social occupation.

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

would get nothing except for the hassle then perhaps Exmouth council ought to take on the problems exiting into Exmouth itself.

Michael Burton

Full name: Michael Burton

Proposal:

5. Development in the Towns and Villages

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

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

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

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

1. South West Water cannot and does not provide adequate sewage systems at the present - they are all overloaded and antiquated.

2. The access road onto the B3179 opposite the archery club - no reasonable or intelligent traffic survey has been carried out. One only has to look at a Bank Holiday Monday with a car boot sale at the Archery Club to observe considerable traffic jams in both directions. Considering 700 houses would probably generate at least 1000 cars the road could not take it. Too narrow, poor quality surface - the road is also used for heavy goods vehicles heading into Budleigh as well as the local recycling centre. Local facilities are inadequate to accommodate an increase in usage. Because of the access people would gravitate towards Budleigh - the current local primary school, which is already over subscribed, will be inundated. The Doctor's surgery, also over subscribed, will not be able to cope. The local chemist, recently reduced to one, is already very busy at any time. Public conveniences are very limited in Budleigh as are car parking spaces. There is no indication of how much of the housing might be for affordable or social occupation.

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

would get nothing except for the hassle then perhaps Exmouth council ought to take on the problems exiting into Exmouth itself.

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

Christine Bush

Full name: Christine Bush

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Land at St John's Exmo – 20 Proposing – A Social and community facilities B Around 700 new homes; and C At least 2 Hectares of employment land. Not sound – as not justified – ‘Our chosen strategies and policies should be based on solid evidence and should be the most appropriate when compared to other options we could have chosen.’ This site was considered at the meeting of the Strategic Planning Committee on 3 September 2024 with an officer recommendation not to allocate the site for development with the main issues being infrastructure problems due to securing suitable access, impact on the landscape, impact on the historic environment; particularly centred on the area surrounding the Church of St John in the Wilderness and ecology reasons due to the substantial areas of woodland within the site. Members chose not to accept Officer advice and decided to allocate this site in favour of other sites which were deemed to be suitable for development as recommended by officers in the same report. It was evident from the meeting that Members had not visited the site to assess its suitability for development even though this is one of the largest, if not the largest site allocation in the plan apart from the new town allocations. It was clear from the meeting that the reason for choosing this site was purely political and not substantiated by sound planning reasons to justify development. Access to the site would be a major problem due to the existing road network both within and surrounding the site. The only feasible means of access to the site would be from the B3179 to the northeast of the site, however, this could not be considered to be sustainable given the location and its relationship with the town centre of Exmouth. The site adjoins the East Devon National Landscape and the East Devon Pebble Bed Heaths SSSI to the northeast and a substantial part of the site falls within the 400m exclusion zone for development adjacent to the SSSI. The site is on rising land to the northeast of Exmouth and its development would have a significant detrimental impact on the landscape of the area.

The woodlands within the site, some of which are protected by Tree Preservation Orders provide habitat for considerable wildlife and the development of the site would result in having a significant detrimental impact on the ecology of the area. The Historical core of area surrounding the Church of St John in the Wilderness would be severely impacted resulting in substantial harm to the designated heritage assets of the area. The development is likely to cause problems of flooding due to increased surface water run-off into the nearby Withy Brook. The allocation of employment land within the site appears to be completely ad hoc in terms of its relationship to existing employment sites and would seem to have been included as an afterthought to assist with meeting target allocations. Land for employment uses should be directed to the expansion of existing employment sites in Exmouth; for example, there is available land in the vicinity of the existing business park at Liverton. The Foreword to the Plan states that ‘East Devon is an Outstanding Place’, however, there is a total disregard to that statement in considering this site for development, as it would result in destroying a beautiful part of the East Devon countryside. Proposing this site for development is not sound, as it is not the most appropriate site for development when compared to other options which could have been chosen. The site is not appropriate for development at all and to include the allocation of this site as one of the largest sites for development in East Devon has to be seen as a total disregard for the significant qualities of the area which contributes to making East Devon an outstanding place.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There are other sites which were considered to be suitable for development and were rejected. This site was not considered to be suitable and is not suitable for development. The alternative sites which were deemed to be suitable for development should be considered and included as development sites in favour of this site, which clearly is not.

Full name: Christine Bush

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Land at St John's Exmo – 20 Proposing – A Social and community facilities B Around 700 new homes; and C At least 2 Hectares of employment land. Not sound – as not justified – ‘Our chosen strategies and policies should be based on solid evidence and should be the most appropriate when compared to other options we could have chosen.’ This site was considered at the meeting of the Strategic Planning Committee on 3 September 2024 with an officer recommendation not to allocate the site for development with the main issues being infrastructure problems due to securing suitable access, impact on the landscape, impact on the historic environment; particularly centred on the area surrounding the Church of St John in the Wilderness and ecology reasons due to the substantial areas of woodland within the site. Members chose not to accept Officer advice and decided to allocate this site in favour of other sites which were deemed to be suitable for development as recommended by officers in the same report. It was evident from the meeting that Members had not visited the site to assess its suitability for development even though this is one of the largest, if not the largest site allocation in the plan apart from the new town allocations. It was clear from the meeting that the reason for choosing this site was purely political and not substantiated by sound planning reasons to justify development. Access to the site would be a major problem due to the existing road network both within and surrounding the site. The only feasible means of access to the site would be from the B3179 to the northeast of the site, however, this could not be considered to be sustainable given the location and its relationship with the town centre of Exmouth. The site adjoins the East Devon National Landscape and the East Devon Pebble Bed Heaths SSSI to the northeast and a substantial part of the site falls within the 400m exclusion zone for development adjacent to the SSSI. The site is on rising land to the northeast of Exmouth and its development would have a significant detrimental impact on the landscape of the area. The woodlands within the site, some of which are protected by Tree Preservation Orders provide habitat for considerable wildlife and the development of the site would result in

having a significant detrimental impact on the ecology of the area. The Historical core of area surrounding the Church of St John in the Wilderness would be severely impacted resulting in substantial harm to the designated heritage assets of the area. The development is likely to cause problems of flooding due to increased surface water run-off into the nearby Withy Brook. The allocation of employment land within the site appears to be completely ad hoc in terms of its relationship to existing employment sites and would seem to have been included as an afterthought to assist with meeting target allocations. Land for employment uses should be directed to the expansion of existing employment sites in Exmouth; for example, there is available land in the vicinity of the existing business park at Liverton. The Foreword to the Plan states that ‘East Devon is an Outstanding Place’, however, there is a total disregard to that statement in considering this site for development, as it would result in destroying a beautiful part of the East Devon countryside. Proposing this site for development is not sound, as it is not the most appropriate site for development when compared to other options which could have been chosen. The site is not appropriate for development at all and to include the allocation of this site as one of the largest sites for development in East Devon has to be seen as a total disregard for the significant qualities of the area which contributes to making East Devon an outstanding place.

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

Iris Buteux

Full name: Iris Buteux

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Jill Butler

Full name: Jill Butler

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of over 100 houses and 4.6 acres of land for industry, distribution and research is not based on any evidence of the need for these in this location. The Vision of the plan states in paragraph 2.6 that “ Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development to meet the needs of local communities”. Spatial Strategy in SP01 says that “new development will be directed toward the most sustainable locations....allowing limited development at the service villages” (which includes Feniton).

Policy SP01 was deliberately changed (retrospectively) between the Regulation 18 consultation draft and the Regulation 19 plan following a further meeting (and subsequent debate) of the Council’s Strategic Planning Committee in November 2024 when it was realised that, in allocating 102 houses at Feniton, the plan was not following its own stated spatial strategy of “modest development to meet local needs”. The original Regulation 18 draft policy for the Service Villages mirrored the plan Vision and was only changed retrospectively when the it was pointed out to the Committee that it had no evidence of the local needs in Feniton, and it was debated whether the plan might be found to be unsound by the Inspector because of this inconsistency. So instead of either finding the “evidence” of local need, or alternatively reducing the proposed housing allocation the Committee simply amended the wording of its previously agreed spatial strategy. This represents a blatant contrivance and deliberate action to make the previously agreed strategy now “fit” the subsequent allocation and seems like malpractice. This is all recorded and available on YouTube. The Parish Council does in fact have a local housing needs survey, funded by the District Council which was carried out independently by Devon Communities Together in 2022, which

found a need for 13 dwellings over the following 5 years. Projecting that forward indicates a local need of some 44 houses over the rest of the plan period - not 102. The Plan has clearly not been “evidence led” and therefore has to be unsound.

The employment land allocation of 4.64 hectares was not assessed at the time of the Regulation 18 consultation draft of the plan - that version at the time stated that "employment land.. will be identified...in the Tier 3 and 4 settlements on mixed use sites, to provide small scale jobs and workspaces for new and existing residents....and to reduce the need to commute to work". This 4.64 site (Otry20) was submitted by the landowner fairly late in the plan process. It is hugely out of scale with the village and its needs, and its existing infrastructure. It allocates more land in Tier Feniton for B2 industrial, B8 distribution and E(g)(ii) research and (iii) other industrial uses than that allocated to Tier 1 Exmouth, Tier 2 Axminster and Tiers 3 Seaton and Ottery St Mary, whose allocations are tiny by comparison. In addition there was inadequate consultation on this allocation at the Regulation 18 stage. Feniton Parish Council was prevented by the Committee from commenting on this site because a quirk of history puts this land within Ottery St Mary's boundary rather than Feniton's. The allocation of this site is at out of step with the plan's strategy in terms of size, location, and relativity. Irrespective of this mismatch with stated policy, access to this site is via a narrow country lane which contains two narrow humpbacked bridges (where vehicles cannot pass each other), has no footways and is in open countryside.

There is a well known and documented history of flooding in Feniton. A new flood alleviation scheme is shortly to be finished but has been constructed to deal with only the number of CURRENT houses in the village, and is as yet untested. The allocation of over 100 further houses has the potential to overwhelm this project before it has even been tested. It is well known that sewage is currently discharged into the stream near this location and at times of heavy rain, foul sewer water runs openly across people's private land. Plenty of evidence exists to show the extent of, and damage caused, by flooding.

Additionally, the village school is (and has been for some time) at full capacity. There is no room for expansion. Extra car journeys are already necessary for parents to take children to school in other towns or villages.

Public transport is poor - although there is a railway station, this has been promoted erroneously as “sustainable”, but in practice an average of only 6 people per train

embark or disembark as train services are infrequent because the line is only single track. Prices are high and trains really only allow people who work in the very centre of Exeter to get the train directly to their work, consequently most households commute to work by car.

The settlement boundary of Feniton in the cases of Feni_08 and Otry_20 has been changed without any debate in the village and is therefore undemocratic.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Site Feni_08 should be removed for now to enable a review of the flood alleviation scheme to take place, and for a proper assessment of local need to take place. Any amended allocation should only be added back in if an evidence based local need assessment supports its inclusion.

Site Otry_20 should be removed “as is” in terms of size and scale. to enable proper debate within the village so that local people and the parish council can make proper representations about the site, (in terms of size , scale and location)and not continue to be excluded from this.

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

Miles Butler

Full name: Miles Butler

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This is an amendment to my previous submission on the same subject. There seems to be no way of making corrections to previously submitted comments on the Commonplace system. In short, I made reference to the Feniton Housing Needs survey but inadvertently gave it a date of 2002. In fact the survey was undertaken in 2022.

Full name: Miles Butler

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of 102 houses and 4.6 acres of land for industry, distribution and research is not based on any evidence of the need for these in this location.

The Vision of the plan states in paragraph 2.6 that “Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development to meet the needs of local communities”.

The Spatial Strategy in SP01 goes on to say that “new development will be directed toward the most sustainable locations...allowing limited development at the service villages” (which include Feniton).

Policy SP01 was deliberately changed between the Regulation 18 consultation draft and the Regulation 19 plan following a debate in the Strategic Planning Committee when it was realised that in allocating 102 houses at Feniton the plan was not following its stated spatial strategy of modest development to meet local needs. The original Regulation 18 draft policy for the Service Villages echoed the plan Vision and was only changed when the Committee realised it had no evidence of the local needs in Feniton and debated whether the plan would be found to be unsound by the Inspector. Instead of finding the evidence or reducing the proposed allocation it simply amended the wording of its spatial strategy. This was a blatant contrivance (the evidence is all on the YouTube recording of the Committee).

The Parish Council does have a local housing needs survey, funded by the District Council and independently undertaken by Devon Communities Together. In 2002 it found a need in the village for 13 dwellings over the following 5 years. Projecting that forward, it would indicate a local need for 44 houses over the remainder of the plan period, not 102. The plan has not been evidence led in this instance and is therefore unsound.

The 4.64 hectare employment allocation in Feniton was not assessed at the time of the Regulation 18 consultation draft of the plan. That version of the plan stated that “...employment land ...will be identified...in the Tier 3 and Tier 4 settlements on mixed use sites, to provide small scale jobs and workspaces for new and existing residents, to improve settlement self-containment, and to reduce the need to commute to work”.

The 4.64 hectare Otry-20 site was brought forward by the landowner late in the plan process. There was inadequate local consultation on the site at the Regulation 18 stage. It is completely out of scale with the village and its needs. It represents more land to be allocated in Tier 4 Feniton for B2 industrial, B8 distribution and E(g) (ii) research and (iii) other industrial uses than is allocated in the plan for the Principal Centre Tier 1 Exmouth, Tier 2 Axminster and Tier 3 Ottery and Seaton. The employment allocations in all other Tier 4 settlements are tiny by comparison.

The allocation is completely out of step with the plan’s strategy and makes no sense. Regardless of this policy failure, the site itself is a baffling choice for industrial/distribution uses being accessed off a very narrow country lane with no footways, between two humped railway bridges and in open countryside.

Given the well known flooding history of the village, the as yet incomplete and untested flood alleviation scheme, known surcharging of the foul sewer system, a village school at capacity and incapable of expansion, poor public transport and already very high levels of car use, development of the scale envisaged in Feniton is unsustainable and premature.

The Settlement Boundary of Feniton in the case of both Feni_08 and Otry_20 has been altered to include these sites without any debate with the village about the sense of these extensions. This seems arbitrary and undemocratic.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Striking out housing site Feni-08 Beechwood (a much smaller land area phased at the end of the plan period and following a long term review of the efficacy of the current flood alleviation scheme might be feasible if local demand could be demonstrated).

Striking out of employment site Otry-20 (a much smaller employment site, proportionate to the scale of the village might be feasible in a location with much better access. In reality that probably means toward the A30. Again the flood alleviation scheme needs to be tested as it is quite probable that it will result in downstream flooding of Ottery Road toward the A30, making Feniton an unsustainable location for such uses.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because the District Council has so far been impervious to the genuine, real world problems experienced in Feniton and has not corrected its mis-application of its own spatial strategy as far as Feniton is concerned. I feel that a direct approach to the Inspector is the only way to have these issues raised unless the version of the plan submitted for examination is amended.

Alan Buzzard

Full name: Alan Buzzard

Proposal:

5. Development in the Towns and Villages

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

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

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

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

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

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

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

Beth Cairns

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmouth 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.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The assessment process for Exmo_20 must be fully completed, with its findings upheld. It should not be acceptable to overlook or bypass earlier evaluation stages, particularly when the site has already been deemed unsuitable.

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

Matthew Cairns

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Exmouth 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.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The full process should be completed for Exmo_20, and the result of that process respected. It should not be possible to sidestep or discount earlier assessment stages, including stages which have (already) identified the site as unsuitable.

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable during the site sifting stage (HELAA stage 2). It was never considered a preferred or second choice, which resulted in the site being excluded from the Regulation 18 consultations with Devon County Council.

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan-making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" during the site sifting stage (HELAA stage 2). It was never considered a preferred or second choice, which led to the site being excluded from the Regulation 18 consultations. On 3/9/24, the site was moved from "ongoing assessment" to "allocated," with no further opportunity for public input or representation to the Strategic Planning Committee, despite the assessment still being incomplete.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan-making process has not adhered to NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" during the site sifting stage (HELAA stage 2). It was never considered a preferred or second choice, and as a result, the site was excluded from the Regulation 18 consultations. On 3/9/24, the site was moved from "ongoing assessment" to "allocated," with no further opportunity for public input or representation to the strategic planning committee, despite the assessment not being completed.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy AR01(B). The site is located upstream of Exmouth in the main rainwater catchment area of Withycombe Brook. The subsoil consists of heavy clay, which is impermeable and makes soakaways ineffective, resulting in the land often being waterlogged. Developing this steep site would significantly worsen the already identified flood risk, particularly affecting the lower-lying land at the bottom of the site and extending down through Withycombe.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land designated for housing but also the 400m buffer zone adjacent to the Pebblebed Heaths, effectively designating this land as suitable for development. While housing cannot be built within the buffer zone, its inclusion within the settlement boundary makes it available for other types of development. This contradicts the precautionary approach, as the plan does not adequately safeguard against the potential adverse effects of recreational use and other activities on the Pebblebed Heaths.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy OL05. The main access point to Exmo_20 is 4 miles from the center of Exmouth and only 2.2 miles from the center of Budleigh Salterton, making Budleigh much more accessible for the development. The access route to the site naturally leads toward Budleigh Salterton High Street, while reaching Exmouth requires traveling twice the distance and going around the edge of the town. The High Street, doctor's surgery, primary school, beach, and other services in Budleigh would be the most accessible and obvious choices for Exmo_20 residents. Although Exmouth and Budleigh are currently distinct in terms of functionality, this development would merge the two, with residents living in one town but relying on the services and infrastructure of the other.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy HE02. A development of this size surrounding St. John in the Wilderness Church (Grade II* listed) would have significant negative impacts on the church and churchyard's remote and tranquil surroundings, greatly altering the peaceful setting for worship that currently exists for the congregation.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy OL01. The site is notable for its dark skies, tranquillity, and sense of wildness. In addition to light pollution from the housing development itself, the main access point at the B3179, directly opposite the SPA/SAC/SSSI, would lead to a significant flow of car headlights, disrupting the darkness across the entire site and shining directly onto the Heaths as vehicles leave the site. The area surrounding St John in the Wilderness church is known for its dark skies and strong sense of remoteness and tranquillity, creating a 'wilderness' atmosphere that is integral to the Grade II* listed church. This setting would be negatively impacted by the encircling housing development, regardless of any buffer zone.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines ‘irreplaceable habitat’ as habitats that are technically very difficult or take a significant amount of time to restore, recreate, or replace once destroyed. Exmo_20 will result in the loss of irreplaceable habitats, including a large number of mature trees, many of which exhibit signs of veteranisation. These trees provide unique microhabitats, and their loss cannot be simply mitigated by planting new trees. Additionally, Exmo_20 contains many long-established hedgerows, which are of considerable length. These trees and hedgerows have high intrinsic biodiversity value, offering vital habitats and wildlife corridors. Although efforts can be made to leave space around them, the degradation and fragmentation of these habitats is unavoidable. Nightjars, a qualifying species of the East Devon Heaths SPA, are known to fly up to 7km from nesting sites to feed at night. The loss of foraging habitat or disruption of their feeding routes could undermine the conservation objectives of the SPA. Exmo_20 also lies within an identified ‘Strategic Nature Area’ (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at linking existing wildlife sites and extending habitats. This area provides essential connecting habitats and wildlife corridors between the Pebblebed Heaths to the north and the woodland to the south and beyond, all of which would be negatively impacted by the development of Exmo_20.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 13.23. It is located within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, which is part of the Local Nature Recovery Strategy designed to connect existing wildlife sites and extend habitats. This area provides important connecting habitats and wildlife corridors between the Pebblebed Heaths to the north of the site and the woodland to the south and beyond, all of which would be negatively affected by the development of Exmo_20. Nightjars, a qualifying species of the East Devon Heaths SPA, are known to fly up to 7km from their nesting sites to feed at night. The loss of foraging habitat or disruption of their feeding routes could undermine the conservation objectives of the SPA.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 2.10, objective 8. It will negatively impact the natural environment and lead to the loss of significant biodiversity, both on-site and in the adjacent SAC/SPA/SSSI.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy PB04. The Habitats Regulations Assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects on integrity regarding air quality (East Devon Pebblebed Heaths SAC/SPA)."

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy OL09. The Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects on integrity regarding air quality (East Devon Pebblebed Heaths SAC/SPA)." This is because the primary access to Exmo_20 is via the B3179, which would direct a large amount of additional traffic along the boundary of the Pebblebed Heath. At peak times this could result in additional stationary or slow moving traffic along this boundary, exacerbating the problem further.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy PB01 and does not align with the mitigation strategy. This development could be situated on alternative sites that would result in less or no harm to the Pebblebed Heaths (SAC/SPA).

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development, or one that allow the area to retain its existing charm or character. It is a 'comprehensive development scheme' within a rural part of East Devon adjacent to areas of outstanding natural beauty.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy TR03 and Figure 7 in the Local Plan. Due to the site's limited access, the development would result in a high number of vehicle movements just to reach services in Exmouth and neighboring settlements via the B3179. Given the steep topography and remote location of the site, walking or cycling routes would offer only limited alternatives to driving. The Local Plan highlights that congestion is a major issue in Western East Devon, and since this site has no direct access to Dinan Way or the A376, the resulting vehicle traffic will be forced onto rural B roads, which are already known to be congested and substandard.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 3.34. Despite being a tier 1 settlement, Exmouth lacks sufficient infrastructure and services to support its current population. Even if the proposed development contributes financially to infrastructure improvements, it will not provide an additional doctor's surgery or dentist, both of which are already inadequate for the existing population. Similarly, it will not offer another secondary school—over the past 3 years, many children have had to attend secondary school in Cranbrook due to a lack of capacity at Exmouth Community College. Additionally, the existing sewerage system in Exmouth is so inadequate that sewage is regularly discharged into the sea, often leading to beach closures for swimming. The town's sewerage issues have been reported on national news multiple times, highlighting the scale of the problem.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 11.2. It will increase travel demands and require cars to take longer routes. Housing is proposed at the southern end of the site, while the main vehicular access point is located at the far northern edge, next to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone around the SAC/SPA/SSSI, no housing is allowed within the top 400m, meaning there will be a minimum 0.5km drive just to reach the housing from the site entrance. This would result in at least 1km of driving within the site every time residents leave or return home. Furthermore, from the B3179 site entrance, drivers will need to travel a 4.0-4.3 mile route to reach Exmouth town center. Exmo_20 would thus increase travel needs, leading to more car journeys and longer distances traveled.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 contradicts policy TR01. Walking or cycling will not be the preferred transport option for residents to access shopping, work, school, etc., due to the significant distance. Research cited in the Local Plan indicates that most people prefer to walk if their destination is within 0.5 miles, that cars become the dominant mode of transport beyond 1 mile, and that walking trips beyond 2 miles are rare. Exmo_20 is much farther than 0.5 miles, or even 1 mile, from essential infrastructure and services, making walking or cycling an impractical first choice. Even with the addition of walking routes, cycle paths, or public transport, the steep local terrain, frequent wet / windy weather and the distance to essential services will not reduce the number of car journeys this development will generate. Additionally, it will be challenging for those without access to a car, leading to social exclusion.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 11.6. It is a 'larger' development, and the majority of the site is located more than 800 meters (about a 10-minute walk) from any existing key services and facilities. With no plans to provide substantial key services on-site, residents will likely need to drive over two miles (via the B3179) to reach these services in Exmouth or nearby settlements.

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

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

Full name: Matthew Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 contradicts policy SP01. While Exmouth is a tier 1 town, Exmo_20 is located 4 miles by car from the town center and is physically separate, meaning it cannot be considered part of Exmouth's development area. Exmouth is entirely unsuitable for significant further growth. Situated on a peninsula between the River Exe and the coast, the town center lies at the southern tip, limiting development in key directions. Given the extensive existing development already spread far from the town center, any new development would be closer to neighboring towns and villages, rather than being within Exmouth's core. Therefore, any development in this area would be too distant from the town, making it an unsustainable location.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

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

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

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 -The remote and tranquil surroundings of the church and churchyard of St. John in the Wilderness Church (grade II* listed) will be significantly adversely effected by a development the size of Exmo_20 surrounding it. This will drastically alter the peaceful setting for worship which currently exists for the congregation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to significant light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. Exmo_20 will cause loss of irreplaceable habitats. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". The site has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond. All of these would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. Both on site and on the adjacent SAC/SPA/SSSI there will be adverse affects on the natural environment, and result in the loss of much biodiversity.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_2- from Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is because the main access to Exmo_20 is into B3179, which would send traffic right along the boundary of the Pebblebed Heath.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. There are alternative sites available for this development that would cause much less, or no, harm to the Pebblebed Heaths. (SAC/SPA).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; This is a 'comprehensive development scheme' within a rural part of East Devon. Exmo_20 is currently open countryside, and this is not 'modest' development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement, Exmouth does not have sufficient infrastructure and services for the existing population. Doctors, Dentists, Schools and the sewage waste system would all be incapable of servicing the increased population size. Even should the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither does the proposal provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision. Exmouth Community College is already at capacity with the current population and even with cranbrook secondary school, would be insufficient to support the population's educational needs. The existing sewerage system in Exmouth is currently so inadequate that sewage is discharged into the sea on a very regular basis and the beach is regularly closed for swimming. Exmouth's problem with sewage has been featured on national news several times, highlighting the scale of the problem it has. It does not need to increase the scale of this problem with no plans to reduce the problem.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan, or reduce the size of Exmo_20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will inevitably increase travel needs, and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main access point for cars is at the very northern edge of the site, right next to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted at all within the top 400m of the site, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would mean you were driving a minimum of 1km 'on site' for every journey off site and back. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. People will not choose walking or cycling as their first choice of transport, as it is too far for most people to access school, work, shop quickly and conveniently. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore the idea that people will walk or cycle as first choice of transport is unrealistic. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography in addition to the distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. Most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities, and it is classified a 'larger' development . There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements, such as Budleigh Salterton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Beth Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360 degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from local plan.

Margaret Cairns

Full name: Margaret Cairns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High St. Doctor's school, beach etc) would be the preferred choice of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmp_20 for housing allocation should be selected, one which was deemed available and suitable in HELAA. Exmo_20 would cause harm to the adjacent Pebbled Heaths (SSSI/SAC/SPA/NNR) due to Exno_20 being a supporting foraging habitat. Developing Exmp_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to heritage assets, most signifivcantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICT OL01. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity, This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase in traffic congestion, in conflict with Paragraph 11.2. The isolated location is unsuitable for development as people would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far and too steep from any town centre to use walking or cycling. as their choice of transport and too dangerous considering the inevitable increase in traffic on narrow roads. This is contrary to POLICT TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: 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.

Gavin Callow

Full name: Gavin Callow

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The present infrastructure and facilities are insufficient to support the proposed developments which are out of proportion to the present population. The impact on Budleigh Salterton would be particularly severe through increased traffic, pollution, flood risk, noise and pressure on already overstretched medical facilities, amenities and schools. This large scale development would almost certainly damage the local ecology and environment irreversibly.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Dennis & Su Calver

Full name: Dennis & Su Calver

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: My husband and I wish to comment on the strategic allocations for Whimble, particularly WHIM08 and WHIM11.

As residents of the village we regularly walk up and down Church Road and along, past the school, to Whimble Surgery. At any time of the day walking on this very narrow road, leaves us very exposed to being hit by cars, motor cycles, delivery vans, delivery lorries and tractors. It is impossible to improve the safety of this road due to the historic layout of residential properties. On regular occasions, eg refuse collection/ recycling collection, the road is blocked for both pedestrians and traffic. More and more people are making online purchases and having food deliveries from major supermarkets, adding to the traffic density throughout the village, during the day and into the late evening.

Any housing developments that require residents to utilise Church Road, by car or on foot, will increase the dangers of injury / death or severe damage exponentially. To make any planning decision without fully exploring these dangers, would be foolhardy and probably illegal.

We urge you to fully understand our community and its road layout, before making any strategic decisions in respect of Whimble.

Thank you

Patrick Camp

Full name: Patrick Camp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. ? An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

? Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. ? Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. ? Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality

(East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. ? Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. # Closures and additional delays on the B3179 during construction phases and thereafter will have a crippling effect on the commercial survival of Budleigh Salterton high street shops, that depend heavily on visitors during the summer months. There are already too many vacant shops since the covid crisis and we need to encourage, not deter, holiday visitors to the town. Therefore the B3179 must not be closed or restricted as a consequence of Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan ? Reduce the size of Exmo_20 ? Do not access the site via the B3179 ? Do not access the site via Southern Wood ? Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Elizabeth Campbell

Full name: Elizabeth Campbell

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Policies Map

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: The Exmouth Settlement Boundary at the area designated Bystock Village in the Exmouth Neighbourhood Plan has been changed.

This change is only shown in the Local Plan Policies Map and mentioned in the Settlement Boundaries Evidence Paper. It is not explicitly described in any of the Local Plan Chapters published online for Regulation 19 consultation but it fundamentally changes the basis for development on the north eastern edge of Exmouth.

The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and Exmouth Neighbourhood Plan (ENP) contrary to NPPF guidance. The proposal is thus unsound.

The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The made Exmouth Neighbourhood Plan is very clear that Bystock Village is "the last place the community wants to see development" (made ENP Plan). This protective position has been explicitly supported under the current LP&ENP policies and by the Planning Inspectorate in determining recent planning refusals. Creating ambiguity and specific conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so.

Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary at Bystock Village. The Evidence flaws are:

1. There are no community facilities, either extant or with permission, within the proposed new settlement boundary and so the area does not comply with settlement boundary criteria B2 as asserted in the Evidence. The boundary criteria have been incorrectly applied and the Evidence is incorrect and hence the Plan is unsound.

2. There are no allocations near the new settlement boundary, as stated in the Evidence. The basis for extending the settlement boundary as shown in the Plan is thus false and the Plan unsound.

3. The assertion that, other than allocations, the Old Bystock Estate is largely excluded from the settlement boundary is wholly misleading and untrue. The Evidence was presented to the Strategic Planning Committee who have thus been misled in the basis for decision making and the Plan is therefore unsound.

4. The new settlement boundary creates a direct and specific conflict with the made Neighbourhood Plan. The new settlement boundary enables no new strategic numbers of houses, it is not required by any Local Plan Policy and it is not required by the NPPF. It is however explicitly contrary to the heritage protection policies in the made Neighbourhood Plan. The Neighbourhood Plan is not out of date and there is no evidence that its heritage protection policies need to change. Creating explicit and unnecessary policy conflict between a new Local Plan and made Neighbourhood Plan is contrary to NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.

5. The only outcome of the proposed settlement boundary change is to change a smooth and soft settlement boundary into a crude, irregular penetration into the countryside. The enabling of infill housing will eviscerate the heritage protections in the made Neighbourhood Plan and result in the obliteration of the unique “sense of place” that currently exists in Bystock Village. It will also irrevocably destroy the original spatial and architectural integrity that currently surrounds the Grade 2 listed Bystock Court.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The simplest solution is to remove the proposed settlement boundary change, returning the Exmouth Settlement Boundary at Bystock Village to its existing position (Local Plan 2013-2031). This modification would require no other changes to any element of the proposed Local Plan.

The outcome would be wholly consistent with the LP settlement boundary criteria and new LP Spatial Strategy; it would follow NPPF requirements; would be aligned with draft Strategic Policies 05 and 06; would be consistent with draft Heritage policies in the LP; would leave ENP heritage protection policies undiminished and leaves a wholly clear planning policy position that has already been specifically validated by previous Planning Inspectorate decisions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Neve Campbell

Full name: Neve Campbell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

- An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.
- Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HEO2.
- ?Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is

"currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

- Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan Reduce the size of Exmo_20

- Do not access the site via the B3179
- Do not access the site via Southern Wood " Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Christopher Cant

Full name: Christopher Cant

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh than Exmouth. This undermines the settlement hierarchy a joining of Budleigh and Exmouth contrary to policy OL05 of the local plan.

There needs to be direct road links from Exmo_20 to Brixington and Exmouth.

An alternative site for Exmo_20 should be selected because the present plan would cause harm to the adjacent Pebblebed Heaths. Allocating Exmo_20 is contrary to the HELAA.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Church eroding the attractive rural setting for worship and burials.

Exmo

-20 development would be in conflict with POLICY OL01 by destroying the dark sky in the area, and with the Strategic Nature Area 368 fragmenting and isolating habitats contrary to Paragraph 13.23 of the Local Plan.

Exmo_20 is also in conflict with Policy OL09 and PB04. The mail access point is opposite the SAC/SPA.

Exmo_20 would increase the need for car travel along the B3179 unless access is provided by a bus route directly from Exmouth.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo_20 and only have access from the bottom of the site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jo Cant

Full name: Jo Cant

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II listed church, eroding attractive rural settling for worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies" which is contrary to POLICY OL01

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors, contrary to PARAGRAPH 13.23 of the local plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed heaths SAC/SPA) such that the Plan fails the integrity test. The main access proposed is opposite SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, which would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel contrary to Figure 7

- the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan. There is no provision for improving the infrastructure especially sewage arrangements. What about Doctor's surgeries, schools etc. We do need more affordable housing but Exmo_20 feels to be too isolated and will make everyone there dependent on cars for transport.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jo Cant

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is much nearer to Budleigh than to Exmouth making Budleigh the most convenient town for the new residents. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to policy OL05 of the local plan.

An alternative site should be selected that is deemed available and suitable on the HELAA. Exmo_20 would cause harm to adjacent Pebblebed Heaths (SSS1/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to HELAA, the site selection Methodology & Policy PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Lewis Carr

Full name: Lewis Carr

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

1.1

3. Do you consider that this part of the Introduction chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: At the very heart of this document, there is a desire to increase the number of houses that can built in East Devon, because you've already given permission for more than were allowed in the Plan running to 2031.

So you're looking to extend the period and add in more housing that you'll likely chew through in the next few years anyway.

It's a joke, and should not be allowed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: How about you start planning for life after the current plan ends in 2031?

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.: As mentioned above, you're not keeping to the Plan running until 2031.

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: You're not representing the constituents who voted in the Plan ending 2031

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: So I can hear from real people and see whether they can look me in the eye, and tell me they think they are serving their constituents by going back on what was promised in the Plan ending in 2031.

jon carr

Full name: jon carr

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
increase car travel and congestion. isolated place. too far from town centre to walk or use cycles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lewis Carr

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Ottery St Mary has had an extremely high amount of development in the past 10 years, proportionately higher than neighbouring towns & villages. We have received no increase in services, in fact, we have received a significant decrease in services. In your FAQ's on why we need a local plan you state "In many cases communities have raised concerns about the impacts of development on the capacity of schools, doctors and other infrastructure, however these are common issues experienced by most communities not just in East Devon but across the country. The answer to this is for EDDC to work with infrastructure providers to deliver the infrastructure that is needed and where possible secure funding to support this". I have seen no evidence of this to date, so why should we believe this will happen in the future? The infrastructure needs to be put in place ahead of/alongside development, not trailing after when it is discovered there is no funding for these extra services.

In the past 10-15 years Ottery St Mary has lost its childrens centre (& the groups/advice they offered to new parents/families), it has lost its community hospital and Minor Injuries Unit, the bus service serving the town has been reduced, there is increasing pressure on the GP service and it can be extremely difficult to even make contact with the GP surgery, let alone make an appointment, there has been no increase in educational provision, the roads are in really bad condition - lots of pot holes and despite numerous complaints the extremely damaged speed bumps outside the Kings School haven't had a proper fix in over 10 years, one of the public footpaths eroded into the river and no solution has arisen to reopen this footpath, the footbridge over the river has been damaged/shut making it dangerous for both residents and Kings School children commuting to/from town and school, other services in the town are currently at risk/being reduced due to lack of funding. I have seen no evidence in the past 10 years of EDDC working with infrastructure providers to deliver required funding/improve

infrastructure and yet we are expected to believe that you will in the future. It feels like EDDC are determined to fill East Devon with houses with no thought to the future/no fight back to central government about required numbers/no thought for existing residents and the services/amenities a town does (or doesn't) have.

Section 106 money has so many limitations placed on it, it can't be used to help the organisations which most need help.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe the housing policy needs to be revisited prior to any decisions being made. There should be a legal requirement placed on all new homes builders to ensure that houses are environmentally sustainable - they should all have their own means of generating power either by solar panels or heat pumps, they should take up less land to fit more homes into the space we have (e.g. build taller rather than wider).

EDDC needs to look beyond immediate needs to the future - if you allow Land at Thorne Farm to be built upon (land which is currently allocated for educational or community purposes) then you immediately block the possibly future expansion of the Kings School & the leisure centre. Whilst The Kings School may not need to expand at present, if you continue to allow our community (& neighbouring villages) to continue to expand at the current rate, then the Kings School (& Ottery Primary School) will soon need to expand. If you allow building on this site then there will be no room for the school to expand and you will then need to find a much bigger site for either a new school or to move the current school to. It is a very short sighted vision. Added to this, residents of Ottery have been asking for many years for a swimming pool, an obvious location for this is next to the Kings School and Leisure centre. Again, build on this site and you remove that possibility completely in a very short sighted move.

During Covid, and then when the war in Ukraine started it made us all consider how, as a country, we need to be more self sufficient. Build on our farm land and take this away, you remove the ability for us ever farm that land again.

Ottery is not a big town like Honiton, Exmouth and Sidmouth. It has very small roads and on the occasions that one of the main routes in/out of Ottery are closed (which happens surprisingly regularly due to accidents, repairs, works) then there is utter chaos on the country lanes surrounding the town, with lorries, buses and tractors often meeting each other on narrow country lanes and getting completely stuck.

The roads in the centre of Ottery are not designed for the amount of traffic that they currently have, let alone more.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lewis Carr

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: N/A

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Goes against the democratically approved Local and Neighbourhood Plans running until 2031.

Consider that in the Neighbourhood Plan, the built up boundaries and area zoned West of Kings School are protected until 2031.

Goes against the duty of the council to represent the wishes of their constituents.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Scrap and work on a plan starting in 2031.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
N/A

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Goes against the democratically approved Local and Neighbourhood Plans running until 2031.

Goes against the duty of the council to represent the wishes of their constituents.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Scrap and work on a plan starting in 2031.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: N/A

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Goes against the democratically approved Local and Neighbourhood Plans running until 2031.

Goes against the duty of the council to represent the wishes of their constituents.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to look the council in the eye and see whether they can lie to my face that this represents the wishes of the constituents.

David Carrington

Full name: David Carrington

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Feni_05 (Land at Burlands Mead) and Feni_08 (Land adjacent to Beechwood) - Whilst I welcome this level of increased housing provision over the 17-year timescale of the plan (and no more than this): The existing sewerage is already critically inadequate. (This is widely documented by residents, including in written responses to EDDC in many recent development proposals, and by the Parish Council.) The inadequate sewerage should be a show-stopper to further housing until rectified, due to its severe impact on quality of life and potentially health.

Otry_20 (Land to the south east of Bridge Cottages) - Whilst I welcome the local employment this site would bring to Feniton over the 17-year timescale of the plan:

- The site is totally outsized for a village location.
- The site entrance location is poor, being on a narrow lane without footpath.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Feni_05/Feni_08

Sewerage: Revise the 'East Devon Local Plan 2020-2042: Infrastructure Delivery Plan', to include an additional Utilities Project to upgrade sewerage in Feniton. (cf the existing UTI-1 for new water mains). This to be Priority 1 infrastructure (ref Infrastructure Development Plan para 2.1), namely 'fundamental to the delivery of the vision, objectives and policies of the Local Plan', and should thus precede implementation of Feni_05/Feni_08.

Otry_20 (Land to the south east of Bridge Cottages) Size: Reduce the permitted area of development from 4.64 hectares to 1 hectare. Traffic management: No goods vehicles associated with the site to be permitted through Feniton old village. Achievable via weight (and perhaps width) restrictions on both Green Lane east of the site and Broad Lane. Pedestrians/cycles: A new and good quality pedestrian/cycle path from Green Lane to Ottery Road is essential for safe access. Via Greenacres Close or the adjacent strip of land, and Burlands Mead. Implementation of both measures essential before development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Elene Carroll

Full name: Elene Carroll

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: N/A

Nina Kathryn Cartwright

Full name: Nina Kathryn Cartwright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of these irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Nina Kathryn Cartwright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Ralph Cartwright

Full name: Ralph Cartwright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by new trees planting. Exmo_20 also contains many long- established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ralph Cartwright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and much of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Ralph Cartwright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Tricia Cassel-Gerard

Full name: Tricia Cassel-Gerard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Fanchea Catton

Full name: Fanchea Catton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Remove SDO1 development within Exmouth, Maer Lane STW catchment from the Local Plan. Even if to be addressed by SWW, Ofwat processes meant that such improvements cannot be completed within 8 years. To allow development of these locations prior to infrastructure expansion is to knowingly enable, create, add to sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed housing allocations in Exmouth ... A town currently with insufficient sewerage infrastructure, demonstrably broken sewage network and demonstrably under capacity of the sewage treatment facility so without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove site Exmo_20 from the Local Plan The policy does not take into account the already acknowledge failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Peter Chadwick

Full name: Peter Chadwick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Stop

Exmo.20

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.
- Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.
- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.
- The Habitats Regulations assessment (30.01.25) confirms that there is?"currently not sufficient certainty to rule out adverse effects in integrity in relation to... air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.
- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B.
- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too

far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1. • The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan •

Reduce the size of Exmo_20 • Do not access the site via the B3179 • Do not access the site via Southern Wood •
Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Gill Chadwick

Full name: Gill Chadwick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Stop

Exmo.20

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.
- Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.
- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.
- The Habitats Regulations assessment (30.01.25) confirms that there is?"currently not sufficient certainty to rule out adverse effects in integrity in relation to... air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.
- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B.
- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too

far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1. • The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo?_20. This would lead to coalescence of Budleigh and?Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan •

Reduce the size of Exmo_20 • Do not access the site via the B3179 • Do not access the site via Southern Wood •
Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Lucy Chadwick

Full name: Lucy Chadwick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Stop

Exmo.20

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.
- Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.
- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.
- The Habitats Regulations assessment (30.01.25) confirms that there is?"currently not sufficient certainty to rule out adverse effects in integrity in relation to... air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.
- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B.
- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too

far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1. • The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo?_20. This would lead to coalescence of Budleigh and?Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan •

Reduce the size of Exmo_20 • Do not access the site via the B3179 • Do not access the site via Southern Wood •
Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Janice Chaldecott

Full name: Janice Chaldecott

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach, amenities, etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like personally to hear the debate - pros and cons. Democratic principles.

Christian Chalker

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: On page 13, point 13, the Connectivity and Transport section aims to reduce reliance on car use, increase walking and cycling, and minimize impacts on the local road network to reduce congestion. However, the development of site Exmo_20 will not achieve these goals. The site is on a steep slope from North to South, effectively splitting it into two due to access restrictions. The main access point for this large development is onto the already congested B3179, which has known congestion issues¹.

Residents will not walk for their main shops, doctors, dentists, etc., as the main access point is over 4.2 miles from the town center². Additionally, due to the site's size, the majority of residents will have to travel nearly 0.5 miles just to reach the main access point². This makes the site unsustainable and it should be removed from the Draft Local Plan.

The main access to the site is significantly closer to Budleigh, making this the more accessible and convenient town. The services and infrastructure of Budleigh are unsatisfactory to meet the needs of a growing population. This would lead to a coalescence of Budeigh and Exmouth. Similarly the increase in traffic flow would bombard Woodbury, an already dangerous and congested road.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Remove Exmo_20 from the plan.

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Incorrect Map: The map on page 326 incorrectly includes your homes, the Grade II* listed church, and the caravan park within the shaded area for the Exmo_20 development. This issue has been raised multiple times with EDDC, including with the Chair of the Strategic Planning Committee and planning officers. The correct map, shown in blue within the Reg 19 evidence, should be used instead¹.

HELAA Report Discrepancies: The HELAA report from November 2022 lists several sites, including Exmo_20, as "not suitable or achievable," which contradicts the February 2025 Sustainability Appraisal Report's assessment of these sites as suitable, available, and achievable³².

Conflict with Policies: The development of Exmo_20 conflicts with various policies, including:

POLICY OL01: Adverse effects on tranquility, wildness, and dark skies¹. POLICY PB04: Impact on air quality affecting East Devon Pebblebed Heaths SAC/SPA⁴. POLICY HE02: Significant adverse effects on St. John in the Wilderness Grade II listed church and churchyard. Sustainability Concerns: The development does not minimize the need to travel, as it is located in an unsustainable area with the main access point over 4.2 miles from Exmouth town center.

Site Selection Methodology: The inclusion of Exmo_20a and Exmo_20b in the Reg 18 consultation is questionable, as these sites were not mentioned in any key evidence reports or discussed at relevant meetings¹.

Climate Change and Transport: The development does not align with goals to reduce reliance on car use, increase walking/cycling, and reduce congestion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove Exmo_20 from the plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See attached PDF.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

The site Exmo_20 is upstream of Exmouth, with main rainwater catchment into Withycombe. As a resident on the land proposed for widescale development I am aware of the clay soil and risks to flooding, myself and my neighbours are unable to walk on our gardens in the winter months due to high water tables and flooding ground. This is in conflict of Policy AR01B.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Copilot The Exmo_20 development would have significant adverse effects on St. John in the Wilderness Grade II listed church and churchyard, drastically altering the peaceful setting for worship that currently exists for the congregation. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Habitats Regulations Assessment (dated 30/01/2025) confirms that there is "currently not enough sufficient certainty to rule out adverse effects on integrity in relation to air quality" for the East Devon Pebblebed Heath SAC/SPA1. This indicates that the Exmo_20 development conflicts with Policy OL09 and Policy PB0423.

Currently, without the increase of 700 - 1400 additional cars there is significant ques of traffic approaching and leaving the B3179, in particular through Woodbury. The addition of these additional vehicles will bring the risk of significant environmental damage.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development of Exmo_20 would fragment and isolate habitats, destroying wildlife corridors, which violates paragraph 13.23 of the local plan. It would also harm irreplaceable habitats, veteran trees, and species-rich hedgerows across the site, contrary to paragraph 13.9.

As a resident of the site proposed for development we frequently witness deer, foxes, adders, bats and many wild birds. Recently just a few hundred metres from the development there is significant evidence of Beaver inhabitation.

There are multiple tree preservation orders surrounding our property to protect.

Increased footfall and housing on the boundary of the Common is concerning.

I am worried that relevant stakeholders have not been engaged with thoroughly, a FOI with Natural England showed no consultation end of 2024. Similarly contact with Devon Wildlife Trust is suggestive of limited communication or engagement. The maps and outlines for the proposal, including access have changed which means that it's not clear if any discussion with stakeholders has been on accurate maps and proposals, and therefore allowed full consideration of the implications.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Exmo_20 development would cause significant and irreversible damage to tranquility, wildness, and dark skies, which is contrary to POLICY OL011. The Pebblebed Heaths, designated as a specialist conservation area, should be protected. However, this development would force wildlife into smaller, restricted areas, placing them at risk due to human encroachment on areas of outstanding natural beauty.

Transparent and detailed engagement with stakeholders such as the Devon Wildlife Trust and Natural England has been poor.

The access to the site is proposed right off the main B road. The increased volume of traffic through the immediate area as well as the additional footfall, dog fouling etc is a real risk to the environment.

There is confirmation of beavers at Bystock ponds along with other rare wildlife which will be grossly disturbed by the creation of this development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development of Exmo_20 will undoubtedly fragment and isolate habitats, destroying wildlife corridors. This contravenes paragraph 13.23 of the local plan. The impact would be devastating, causing irreparable harm to habitats and affecting vegan trees and species, which is against paragraph 13.9.

As a local resident, I have firsthand experience with the area's wildlife, including deer, birds, and dragonflies that frequent our garden. We are surrounded by tree preservation orders to mitigate damage and destruction. It is impossible to build such a large development, which has the potential for further expansion in the future, without harming the habitat and its resident wildlife. There has been poor engagement with organisations such as Natural England and Devon Wildlife Trust. Maps have been inaccurate, the perimeter of the site boundaries and main access changed. This has led to really unclear and poor communications which have been misleading both the general public and important stakeholders.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove from the Plan based on the close proximity and devastating damage to the Bystock Ponds and Common.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development of Exmo_20 would with certainty fragment and isolate habitats and destroy wildlife corridors. This goes against paragraph 13.23 of the local plan. This would have devastating effects, detrimental to irreplaceable habitats and vegan trees and species. This is contrary to paragraph 13.9. As a resident of the local area I have first hand experience of the wildlife, with deer, birds and dragonfly frequenting our garden. We are surrounded by tree preservation orders to mitigate damage and destruction. There is no way to build such a huge development, which has been cited as having even further potential for scope of development in future years to come, in a way that protects and sustains the habitat and it's resident wildlife.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Exmo_20 development would destroy and cause immense terminal destruction to tranquility, wildness and dark skies”, this is contrary to POLICY OL01’.

The Pebblebed heaths should be protected as a specialist conservation area, yet this wildlife will be driven into smaller and restricted area, placed at risk by human development on areas of outstanding natural beauty.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christian Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed Exmo_20 site should not be allocated due to the immense risk of harm to the local environment and Pebblebed healths (SAC/SPA). This is in breach and contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. Protection legislation is there to ensure these areas of outstanding natural beauty and associated wildlife are kept safe. Sprawling and extensive developments such as this on the boundary of these areas will destroy and cause harm with pollution, light pollution, footfall, dog fouling. There have to be alternative sites in and around the local area which are better suited and will cause less irreparable environmental impact.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan and reallocate housing allocation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Joanna Chalker

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 or reduce to Exmo_20B.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

LACK OF CONSULTATION & ENGAGEMENT The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete. Lack of transparency means that members of the public have not had opportunity to consider and feed into the plans.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: EDDC has mis-led the community, with poor and non-transparent communication. Exmo_20 as a site was discounted as a site and therefore marked red (non-allocated), similarly the site has been referred to in multiple allocations (Exmo_20, Exmo_20A, Exmo_20B, Exmo_46). This has meant that the opportunity for community engagement has not been possible and led many to believe that the "declined by planning inspectors" means that the development can no longer happen, which is incorrect. Similarly large stakeholders such as Natural England have not been consulted (FOI obtained November 2024) which is a significant concern in terms of informed process.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: EDDC has mis-led the community, with poor and non-transparent communication. Exmo_20 as a site was discounted as a site and therefore marked red (non-allocated), similarly the site has been referred to in multiple allocations (Exmo_20, Exmo_20A, Exmo_20B, Exmo_46). This has meant that the opportunity for community engagement has not been possible and led many to believe that the "declined by planning inspectors" means that the development can no longer happen, which is incorrect.

Similarly large stakeholders such as Natural England have not been consulted (FOI obtained November 2024) which is a significant concern in terms of informed process.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

INCREASED FLOOD RISK Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. (POLICY AR01(B) states that development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere). As a resident close to the proposed Exmo_20 site I am more than aware of the clay soil which waterloggs the gardens and spaces around my own property and neighbours. During the winter months we are unable to access our gardens due to excessive water collection and poor drainage, this will be exacerbated and place not only the properties onsite but also those downstream.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXTENDING THE SETTLEMENT BOUNDARY OF EXMOUTH Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths. The potential environmental harm from the development will likely be devastating for the wildlife of the Pebblebed heaths and local area. Moving the boundary of the town right to the top of the Pebblebed heaths will no doubt impact from a footfall, light pollution and vehicular pollution at the least. There are minimal/unsatisfactory facilities within the site which means that travel to Budleigh, Woodbury, Exmouth or Exeter is a requirement.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

COALESCENCE BETWEEN BUDLEIGH AND EXMOUTH Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. (POLICY OL05: This policy stated that development will not be permitted if it could lead to or encourage settlement coalescence). As a parent of a primary school age child resident in the area of the proposed Exmo_20 we attend Budleigh for school and nearly all facilities due to the proximity. This would no doubt be true if the development proceeds putting excessive pressure on the infrastructure and road networks.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce to Exmo_20B or reallocate housing allocation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

POLICY OL01 states that development will only be permitted where it would not harm the aesthetic and perceptual factors such as “tranquillity, wildness and dark skies”. HERITAGE / ST JOHN IN THE WILDERNESS CHURCH. ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. (POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings). Similarly the devastating impact on environmental tranquility in view of an enormous development with main access straight onto the B379 and onto the Common.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. (PARAGRAPH 13.9 aims to protect irreplaceable habitats and important features such as ancient woodlands, veteran trees, and species rich hedgerows from destruction and degradation).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. (PARAGRAPH 13.23. The Local plan states that East Devon has diverse but fragmented habitats and aims to enhance biodiversity increasing habitat areas and connecting isolated habitats).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce in size to Exmo_20B or reallocate housing quota to more suitable location.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

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ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. (PARAGRAPH 13.23. The Local plan states that East Devon has diverse but fragmented habitats and aims to enhance biodiversity increasing habitat areas and connecting isolated habitats).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce in size to Exmo_20b or reallocate housing elsewhere in better suited areas.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI. (PARAGRAPH 2.10. Objective 8. This states the objective “To protect and enhance our outstanding natural environment and support an increase in biodiversity”).

There is extensive wildlife inhabiting the Pebblebed Heaths and bystock ponds, ranging from ground nesting birds, owls, beavers, cuckoo, woodpeckers, deer, dragonflies and a multitude of other species. The introduction of a large development so close to the protected sites will adversely effect the wildlife and cause destruction of the local habitats due to light pollution, vehicle emissions, increased footfall, dog fouling etc. The inclusion of "nature spaces" proposed within the plan following the disruption and development of 700+ houses will not be enough to mitigate the huge negative impact.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce to Exmo_20B or reallocate to another site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).” (POLICYPB04 states that proposed plans must not affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 (including SAC/SPA)). The increase in vehicles accessing the site will undoubtedly impact the air quality and have adverse effects on the local environment. As a local resident who drives the road for a school run the road is already treacherous with the volume of traffic currently, blind spots and challenging junctions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath. (Policy OL09 states that “permission will not be granted for development which would result in pollution that cannot be adequately mitigated”). The initial proposal is for 700 houses. Council have already indicated that there is opportunity for a much larger number within the plot. The location of the plot and steep topography mean that the site will predominantly be accessed by road, the average household own 2 vehicles which means in excess of 1400 additional vehicles travelling on an already busy and at times fast and dangerous road with multiple junctions and poor signage. This site borders the Pebblebed Heaths. The significant emissions have potential to cause serious and irreparable harm.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA). (Policy PB01 states that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless they cannot be located on alternative sites that would cause less or no harm). The allocation of this plot will no doubt cause immense harm to the local wildlife by a combination of but not limited to : damage/impact of light pollution, emissions pollution, dog fouling, increased footfall and human impact. There are ground nesting birds, rare species and of late significant evidence of beavers in recent months, all of which will be compromised by this development so close to the site. Even with a 400m buffer there is no certainty that this buffer cannot be utilised for commercial or communal areas, all of which will have significant detrimental impact. In addition there are no pavements or safe pedestrian crossing areas.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce the size of Exmo_20 to the proposed 20B or reallocate. Remove the main access from the B379.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon. (PARAGRAPH 2.6 states that "Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development). NATURAL ENVIRONMENT

Allocation of Exmo_20 is in conflict with policies PB01, PB04, OL09, OL01 and paragraphs 2.10, 13.23 and 13.9 of the Local Plan.

The building of 700+ houses and commercial buildings on the edge of an area of outstanding natural beauty which is inhabited by extensive wildlife will degrade and destroy the charm and character. It is enormously concerning that decisions have been made to allocate this site against planning inspectorate advice and in the absence of formal consultation with important advising and regulating bodies due to misleading communications ie. Map outlined site Exmo_20 as rejected. This would lead stakeholder and members of the public to assume that the site was non-viable and therefore not progressing which is incorrect (FOI confirmed that Natural England had not as of December 2024 been consulted - I have this in correspondence dated 17th December). "In response to your request Natural England can confirm that we have not been consulted by or hold any correspondence with EDDC over this proposed development.

The screenshot included in your email corresponds to the Exmo_20 site. The initial Draft Local Plan consultation (November 2022) showed Exmo_20 to have been rejected

as a housing allocation site. The further consultation in May 2024 with additional sites did not include Exmo_20."

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce in size to Exmo_20B or reallocate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard. (POLICY TR03 states that where development is likely to generate significant amounts of vehicle movements planning permission will not be granted unless they can identify measures to secure new sustainable travel arrangements, taking into account (amongst other things) the scale of development and the availability of public transport, and walking and cycling opportunities). As an individual who frequently commutes to work the challenges of driving through Woodbury or returning up onto the Common which often at this time can result in significant travel delay and queuing vehicles backed right down onto the Woodbury road. The addition of the volume of cars associated with the 700 proposed houses will exacerbate exponentially. There are multiple entrances onto the B3179

which at this time can be treacherous to navigate. There is not the infrastructure to safely support this development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, reduce the size of the allocation to 20B only or reallocate housing elsewhere.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. (Paragraph 11.2 promotes focussing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion). As an individual who is required to travel frequently to work the road infrastructure of the B3179 is often even without the additional housing congested, accidents and with multiple unsafe junctions opening onto the road. The cross roads at Bystock are a dangerous crossing point for walkers, cyclists and horse riders. Additional vehicular pressure on this already challenging road adds enormous risk and is dangerous. The additional traffic and associated environmental damage that this will cause poses great risk to the local wildlife and habitat.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20,

reduce size of site or reallocate housing elsewhere in Exmouth. Do not access the site via the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. (Paragraph 11.2 promotes focussing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of exmo_20, considerable reduction in size (revert to Exmo 23)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: For transparency.

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion. (POLICY TR01 proposes that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development). As a resident local to this area I am aware of the impracticality of proposed transport methods. There are no public transport links and the added pressure on the B3179 is an immense concern - specifically on the already congested road networks of Woodbury and at the crossing points to the Common frequented by dog walkers.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure a thorough hearing and consideration of all points raised/concerned.

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6.

It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements. As a resident within this proposed catchment area I am very aware of the requirements to drive to access services such as basic local shops, GP, dentist and primary school. There are no significant infrastructure plans to mitigate this requirement. Additional travel impacts significantly and in a harmful way on the environment, it is particularly concerning so close to the Pebblebed heaths. The B3179 in it's current state is a fast road with no calming, which poses significant risk with the introduction of large volumes of additional traffic. (PARAGRAPH 11.6 proposes that it is feasible for larger developments to be within 800m of key services and facilities. (Studies cited in the Local Plan show that people prefer to walk if their journey is not further than 800m/10 minutes walking each way)). Such properties will encourage road use and be unsustainable for those residents who do not have this mode of travel to access basic facilities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, reduce to previous proposal of Exmo_20B or reallocate elsewhere in area.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To have the opportunity to share in full concerns and ensure appropriate action/mitigation.

Full name: Joanna Chalker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location. (POLICY SP01 proposes to promote the most significant levels of development at the principal centre of Exmouth).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, reduce in size to previous Exmo_20B and allocate elsewhere.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to be present to ensure that all complaints and concerns raised are considered, addressed and clear outcomes.

Julie Chance

Full name: Julie Chance

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The following material considerations apply: Impact on Amenity - Noise from construction and traffic whilst constructing. Noise from occupation and traffic would impact on the environment and the right to enjoy the habitat. 100+ dwellings would lead to many more occupants with the ownership of vehicles. Environmental Considerations - the construct and habitation from the development would lead to a loss of biodiversity and should be surveyed by an appropriate body. The area is situated within a flood risk. An appropriate survey should be carried out. At the parish council meeting it was advised that properties in this area could not get adequate insurance. This would disadvantage inhabitants. The construct would lead to greater flooding. The air and water quality should be appropriately surveyed as the increased burden could contaminate the water quality, such as sewage. The air quality would suffer with the increased traffic during construct and habitation. The biodiversity would suffer in regards to the songbird population and wildlife that has had the benefit of using this land and the loss of there habitation. Increased traffic from sewage demand. Highway Safety and Transport - the road access would lead to safety concerns in that the road to Whimble would need considerable upgrade with speed monitoring. There are no footpaths on this road. Increased risk of heavy lorries being on the roads during construct and for sewage plant.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The site is not fit for for purpose. It needs a Flood risk assessment and and environmental impact assessment including air quality.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It appears not to be sound as there hasn't been the necessary checks and balances for this site. The parish council do not seem to be listening to the parish. The recent parish council meeting suggested that we had no choice but to accept this development was happening.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Full assessment in respect of flooding, air and environmental impact. Impact on Infrastructure. Impact on schools, surgeries, and quality of life.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The councillors at the recent 13 March 2025 public consultation meeting seemed to start from a position of bias, claiming that the development was 90% going to happen. The meeting minutes are not yet available but the chairman appeared unwilling to capture and/or feedback legitimate material considerations back to EDDC. 1 councillor has a conflict of interest owning land which they would benefit from planning permission in this locale. 1 councillor was concerned with social equity should the build go ahead but seemed to suggest that there was no inclusion

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Nick Chapman

Full name: Nick Chapman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be unsurmountable. If the site cannot come forward within the plan period for development then it should not be allocated.
- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation

- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;
- Development will have a direct and serious detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will affect public safety negatively.

- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue to be so;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is extremely poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

Bob Chapman

Full name: Bob Chapman

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

8.1

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Clearly the Council has little or no control over developers. I believe once planning permission is granted the developer MUST be given as set timescale in which to complete the development, failure to meet the timescales should carry punitive penalties. EG. look at the situation in Seaton (Pebble Beach) Bovis have taken over a decade to complete just 195 of the 222 planned homes (some small) at the rate they are going the site will never be finished. During which time the S106 monies/promised facilities have not been forthcoming.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Set completion deadlines with penalty clauses S106 obligations enforced

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Ruth Cheesman

Full name: Ruth Cheesman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO_20 access point is close to the town of Budleigh Salterton. This would mean that residents would most likely use the facilities in Budleigh rather than Exmouth. Budleigh Salterton has one high street, one primary school, one doctors and limited parking. This would undermine the settlement hierarchy and the Local Plan. It would go against the Strategic Nature Area 368 dividing a natural area. Policy OL01 - goes against this as it will damage the countryside.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Neill Chippett

Full name: Neill Chippett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Not legal because it does not meet the necessary safety and access requirements.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The field on Burscombe Lane Sidm_31 needs to be removed from the plan

1. Extremely difficult to respond online.

2. Not legal, inadequate access to field.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Unsound because 1. The road Burscombe Lane is prone to subsidence. 2. Access too narrow. 3. No room for pavement. 4. Potential flooding issues.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

1. Failure to cooperate with Highways.
2. Failure to cooperate with residents.
3. Failure to cooperate with National Landscapes.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is vital to protect any areas that are AONB or National Landscape. Common sense and logic need to be voiced and not legal terms which many people find impossible to understand.

Suzanne Lienert and Adriana Chittleborough

Full name: Suzanne Lienert and Adriana Chittleborough

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Legal Compliance The proposal is not legally compliant with the designation of National Landscapes. Under Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023, public bodies must ‘seek to further’ the purposes of protected landscapes. The East Devon AONB, in which this site is entirely located, is afforded the highest level of protection under Strategic Policy OL02. Development within a National Landscape is only permitted where it avoids harm and contributes positively to the special qualities of the area.

There has been no evidence that this site meets these criteria. Instead, the developer’s own assessments acknowledge the harm it will cause. Furthermore, in the Planning Committee discussions, there was no consideration of how this development would meet the legal requirement to enhance the AONB. Proposals to limit the development’s footprint were later reversed in favour of expanding it, without proper scrutiny or compliance with the Levelling Up and Regeneration Act.

Additionally, Policy OL02 states that major development in a National Landscape will only be permitted in exceptional circumstances and when it is demonstrably in the public interest. There has been no explanation of what the exceptional circumstances are or how this development serves the public interest. This failure to consider the legal requirements further undermines the validity of the site’s inclusion in the emerging Local Plan.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

We are writing to formally object to the inclusion of land around Furzehill Farm in the emerging Local Plan. While our property is not directly opposite the site, we are significantly affected by both the increased risk of flooding and the dangers posed by additional traffic on the already hazardous A375. Soundness of the decision For a decision to be sound, it must be based on solid evidence and represent the most appropriate option. The Planning Committee's discussions on this site were superficial and lacked the necessary data to support an informed decision.

1. Flooding risks – The site is located on steep agricultural land with non-porous clay soil, contributing to surface water runoff. Localised flooding is already a serious issue, affecting our property and others nearby. It has since been confirmed that the site cannot use road drains to manage runoff, raising serious concerns about the viability of any drainage solutions. There is significant flooding without the extra housing. Unless the the infrastructure can be upgraded meet expectations to not worsen the situation, the current proposal is not viable.

2. Road safety and infrastructure – The A375 is narrow, with blind corners and no footpaths, making it dangerous for pedestrians, cyclists and existing traffic. No expert assessment of the proposed access has been conducted, despite the clear risks. The Town Council and local residents have repeatedly raised concerns that additional traffic from 43 homes would make the road even more hazardous.

3. Lack of proper process – Initially, only part of this site (Sidm-34a) was being considered to preserve a break between developments. However, following lobbying by the developer, the full site (Sidm-34a and 34b) was included in the plan without transparent discussion or debate. This undermines the credibility of the decision-making process.

4. Failure to compare to alternative sites – The committee did not rank or compare sites for suitability. Instead, sites were reviewed in isolation, and when the committee found they had not met their housing target, they revisited previously rejected sites with lower thresholds. This is not a robust or strategic approach to site selection.

5. Viability and sustainability – Given the site's challenges—steep slopes, impermeable soil, and the need for significant infrastructure investment—there is no evidence that it can be delivered affordably or sustainably. A developer has already stated that it would not be viable to build here while meeting affordable housing requirements, undermining the rationale for including it in the plan. This is particularly the case when coupled with the danger to life from the road, lack of footpath and blind spots.

6. National Policy Compliance – The proposal fails to meet national policy objectives. It does not comply with the requirement to “seek to further” the National Landscape, nor does it align with policies prioritising the delivery of affordable homes.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Given these legal and procedural failures, we strongly urge the removal of this site from the emerging Local Plan. Including it would set a dangerous precedent for development within the AONB, undermining national and local policy protections for East Devon’s landscape and failing to ensure a sustainable future for Sidbury.

Ian Christie

Full name: Ian Christie

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I do not believe that the development at Exmo_20 and Exmo_17 is sound, for the reasons below.

Exmo_20 is adjacent to East Devon National Landscape. Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty) includes the following: "Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant)". The site is adjacent to an NL. Due to the site's very elevated and sloping position, the site will be highly visible from a wide area including parts of Exmouth, the Exe estuary, and the other side of the Exe estuary. What at present is a charming rural view from these areas, topped by the Pebbledbed heaths, will become a very large housing development. This will negatively impact a very wide area from which this development will be visible. I believe therefore that it fails Strategic Policy OL02.

Exmo_20 will also negatively impact on traffic congestion, contrary to transport policy TR01. It is not a suitable location for anything other than car transport. It is too steep and too far from key services and facilities for cycling or walking, there is no nearby train station and bus routes are limited. Already the congestion into Exeter in the mornings is bad, with considerable queues at the junction of the B3179 and the A376 (as well as beyond there to the M5 motorway roundabout), and this will add to that congestion.

Exmo_17 is within a National Landscape ("NL"). Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty) includes "Development in a NL...will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant)... Major development in a NL will only be permitted in exceptional circumstances". I believe that a housing development of this scale is a major development and I don't think its development is exceptional circumstances. Furthermore, I don't think it will contribute to the natural beauty of the NL. For example, the very popular cycle/walking path between Exmouth and Budleigh Salterton along the old railway line provides pleasant rural scenery and passes through the middle of this development so will be spoiled by this development - or will force people in Exmouth to have to walk further to get to a rural setting. It therefore fails the NL policy requirement on two counts. It also sets a dangerous precedent, expanding Exmouth eastwards into the NL. Where will such expansion stop? Having expanded once eastwards, what will stop Exmouth expanding further eastwards into the NL? Really this area should be a green wedge, but this should be unnecessary given the NL.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20

from the local plan or limit it to a much smaller scale development adjacent to the existing development in the Meadowhall Road / Woodfield Close area. This will (i) ensure that it doesn't impair the view of the NL from a wide area, (ii) reduce the distance needed to be travelled to access services and facilities making it feasible to walk or cycle, and (iii) avoid excessive congestion on the B3179.

Remove Exmo_17 from the local plan. This will avoid unacceptable encroachment into the East Devon National Landscape and retain access to green spaces from the east side of Exmouth - eg along the shared walking/cycle path.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Eleanor Clarke

Full name: Eleanor Clarke

Proposal:

1. Introduction

Emma Clarke

Full name: Emma Clarke

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please note that this response has been edited to remove content that did not comply with the obligations under the Equalities Act 2010

I feel like the Old piggery site is unsuitable for the following reasons...

- Lack of school places and there's already too much pressure on the schools, doctors, dentists, healthcare services i.e the pharmacies. I personally needed a doctor's appointment the other day and I had to wait 4 weeks for an appointment. On a separate medical issue I have been waiting 1.5 years for a referral from my doctors to see someone at the hospital.

- Protection of the country park - the country park bins are already overflowing at all times and do not get emptied regularly therefore there is rubbish and dog poop bags left on top of the bins and around the bin which is unsanitary and unsightly.

-Protection of wildlife in the country park

-The Old piggery site is in proximity to flood zone 3 which with climate change will only get worse and the site is on a flood zone

- Safety and security of the scouts

-Welfare and security of the residents that moved to this area at the point when there was no plans for a traveller site

-Risk of environmental damage and fly tipping

-Noise levels with proximity of M5 and SW rail

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-Langaton Lane is a no through road and is used as a walking route to schools, station, doctors, shops

-The gun range is right next to the old piggery site and the members of that club (including both my sons and my father) have spent an incredible amount of money improving the club and the facilities there.

We will all when adapted pay a fee for maintenance of our country park and estate, will the travellers have to contribute to this as well?

Full name: Eleanor Clarke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

JULIET CLARKE

Full name: JULIET CLARKE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo 20 would increase the necessity for car journeys and thus increase traffic congestion, in conflict with PARAGRAPH 11.2. It is an unsustainable development in terms of existing key facilities available in the area, particularly Exmouth. It is a very isolated site and would require people to travel far further than 800metres to the above existing facilities contrary to PARAGRAPH 11.6. As for suggesting inhabitants might walk or cycle to either town centre is laughable as it is too far and not an easy walk contrary to POLICY TR01. The access to Exmo 20 is significantly closer to Budleigh (which has even fewer facilities than Exmouth) thus practically merging the two towns of Exmouth and Budleigh contrary to POLICY OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo 20 Do not access the site via the B3179 - too dangerous

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

John Paul CLARKE

Full name: John Paul CLARKE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo 20 should not be positioned near to Pebblebed Heaths (SAC/SPA). Developing Exmo 20 is contrary to policy PB01. Exmo 20 is above the main rainwater catchment area for Withycombe Brook and would exacerbate the flood risk. This is in conflict with POLICY AR01B.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce size of Exmo 20 Do not have access via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Edward Clarke

Full name: Edward Clarke

Organisation (where relevant): Sherwood's Tree Care

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We Should NOT be building on Green Field sites. Nature should have a seat at the table, where these decisions are made. There are plenty of empty properties and urban sites which sit there, unused, for years.

The accommodation needed could be efficiently, affordably and ecologically soundly built in prefabricated form, by architects today; giving the youngsters an affordable step onto the property ladder.

The main access point of Exm_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the “tranquility, wildness and dark skies”, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsuitable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Edward Clarke

Organisation (where relevant): Sherwood's Tree Care

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the “tranquility, wildness and dark skies”, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 – the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsuitable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Daniel Clarke

Full name: Daniel Clarke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD04

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site reference Otry_21 I would like to object to the development on this site. I think the site entrances on the Sidmouth road will make Sidmouth road very busy. Especially between 7-9am and 2-6 from school runs and people driving/returning from work. I know there is already lots of families living in ottery but as the schools are at capacity they are having to go to Sidmouth which again doesn't help with the busyness of the road. And during the summer months where tractors frequently go up and down the road with big trailers they already need to pull into the gerway close site just to let cars past as the road isn't wide enough. This is also the case for lorry's that we get. As there would most likely be a link through Claremont field estate that also links to the Sidmouth road it would make Claremont busy and that road also narrows in certain places. As iv already mentioned the schools are at capacity and would need expanding to cope with the extra houses and potential families looking for schools. The drs surgery is also at capacity and struggling with the amount of people in ottery as it is. Having only Sainsbury's as the only supermarket with a small car parking area that already struggles to cope with the amount of people it wouldn't cope with more people in ottery. Ottery population as nearly doubled in the past 20 years and already struggling with the amount of cars driving in and around ottery. The amount of wildlife that we hear from foxes, rabbits, owls, birds etc that live in the fields and nest in the hedgerows will have their habitat taken away and would have to move on to different location. We regularly get the same birds yearly that nest in the hedges that back on to the gerway estate and taking that away will impact on their population. I know there is a need for more housing but that doesn't mean it's ok to just build anywhere and everywhere.

Elizabeth Clarke

Full name: Elizabeth Clarke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I wish to make comments regarding the development sites proposed for Feniton in the local Plan

I do not believe that any further land should be allocated for housing in Feniton due to the lack of infrastructure i.e. adequate access roads, school places in the primary school and at the King's School and medical services. All these services are already overwhelmed and further development is being proposed in Ottery and West Hill. The flood prevention scheme currently under construction has not yet been proven and was in any event only designed for the housing already built.

It would appear that there is a possibility of a development at Colestocks Road being foisted on the village if EDDC loses the pending court case. If this goes ahead there should be no question of any further housing being built in Feniton at all. Reports of sewage problems at the Burlands should raise an enormous red flag in relation to any development on that side of the village.

I wholly disapprove of the commercial site being proposed on the grounds of traffic that would be generated on totally unsuitable roads especially as one of the access roads is designed to flood in future.

As regards the country's need for housing I deeply believe that there is no real need for any further housing to buy as anyone in a financial position to buy can always find a house. The need is for genuinely affordable rented housing which none of the developers interested in Feniton are prepared to provide. Lack of jobs and public

transport make Feniton unsuitable for this type of housing which is better placed in towns where people can walk to services and employment.

Hannah Clarke

Full name: Hannah Clarke

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

SD29: Development of allocations at Whimble - are not sound for a variety of reasons. The lanes throughout the village are already busy and at times dangerous (a community speed watch group is now needed following advice from the Police). Existing residents' vehicles are already regularly using the main routes in and out of the village, including many parents dropping off and picking up school pupils twice a day. Also, the main route (Church Lane) into the village is not wide enough for two cars to pass in many places along it. Furthermore, it does not have a footpath along one side of it to allow pedestrians to safely walk into, out of and around key parts of the village. It is inappropriate to build new homes without basic infrastructure in place to keep people safe. Other sites - not within Whimble village - that can be directly accessed from London Road, the main A30 (or other two-lane A roads) should instead be considered for new housing in East Devon - for example, near to the soon to be built services - the McDonalds and farm shop site - at Daisy Mount. Also, there are already thousands of houses being built in neighbouring Cranbrook and Rockbeare to meet affordable housing and new housing quotas in East Devon. The Cobden Lane development phases is already within the Whimble Parish and will provide new housing, including affordable housing. The other countryside areas surrounding Whimble should be preserved as important 'green spaces/areas' for wildlife and plants to live and flourish so residents see and benefit from countryside being around them. Furthermore, the village primary school is already at capacity and if plans proceed to building 83 more homes, and many of these houses are occupied by families with children, where are these children going to go to school? It certainly won't be the local primary school and it seems that this consequence of building new houses in Whimble has not been considered fully or

properly. Also, having a possible 166 additional cars (or even more) driving around the narrow lanes of the village will be completely impractical and lead to all kinds of environmental and traffic issues - which do not need to be created. Loss of the remaining wildlife and green countryside areas in this part of East Devon is also a reason why building 83 houses is not necessary. Swathes of fields and hedges have already been sacrificed east of Exeter to make room for the ongoing building phases of Cranbrook's new town development so no further green spaces need to be removed in this area to build houses, patios, concrete driveways etc. Green spaces in areas of Whimble have already had to absorb wildlife displaced by nearby house building - where will these creatures of nature and plants thrive if more of their habitat/growing space is taken away? In addition, the increase in traffic (cars, pick-ups, vans, lorries from developers in the first instance and then residents of the new houses) will lead to greater amounts of pollution and damage to both the environment and the conditions of the roads - already full of potholes and crumbling at the edges. An increase in traffic will be harmful to local air quality in the future and to animals, plants and humans in the surrounding environment. Light pollution will also become more of an issue as well.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I consider it necessary to have Whim_08a and Whim_11 removed from the EDDC Emerging Local Plan and advise that the 83 suggested new homes being allocated elsewhere in the area (outside of Whimble Village), where there is appropriate infrastructure and housing developments should be built adjacent to existing main roads (A roads) where two cars can easily pass each other, and where pedestrians can easily use footpaths to access regular bus routes. No alternative sites in Whimble, previously suggested, should be revisited or explored by the Parish Council or any other group - as they have already been ruled out and reasons for this clearly provided earlier in the process.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The information received by Whimble residents earlier in the consultation, following a presentation of proposals in the Victory Hall, was that the

all of the sites initially put forward in Whimble were not suitable for mass house building for one reason or another (access issues, potential flooding issues etc.) Then, more recently, residents have been told that 83 houses now have to be built within the village area. This number is not appropriate for this village. In fact, only about 4 affordable homes are needed over the next 5 years - which should easily be achieved within the Cobden Lane area of proposed development - which is already within Whimble Parish.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

CLAIRE CLEVELY

Full name: CLAIRE CLEVELY

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EXMO-20 development would be in conflict with the strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the local plan. It would cause harm to irreplaceable habitats ,veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jeanette and Paul Coate

Full name: Jeanette and Paul Coate

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

We believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Fiona Cochrane

Full name: Fiona Cochrane

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Woodbury is a relatively small community and major development on the proposed scale (365 houses) is excessive. There are insufficient local facilities (1 small village shop, 1 primary school) to support this many new inhabitants so huge increase in the number of cars on the roads would result. Especially as the local buses are even less frequent than previously. Also the utilities infrastructure would need significant investment to cope, it is unlikely that this would happen.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Fewer houses would reduce the pressure on utilities and transport infrastructure. Or significant investment.

JP Coetzee

Full name: JP Coetzee

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The fields above St John In The Wilderness supports a unique habitat including rare orchids. This development will reduce local biodiversity.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20 should be removed from the plan, or at least significantly reduced.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Steven R. Cole

Full name: Steven R. Cole

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please refer to the attached PDF file 'Representations to East Devon Local Plan Consultation (SRCole EX84EY)'

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached PDF file 'Representations to East Devon Local Plan Consultation (SRCole EX84EY)'

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Gary Coles

Full name: Gary Coles

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Gary Coles

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Gary Coles

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan,

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

simon collas

Full name: simon collas

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Do not access the site via Southern Wood,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Alison Colledge

Full name: Alison Colledge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing EXmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

Developing EXmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01

The main access point of EXmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of EXmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXmo_20 from Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Patrick Colledge

Full name: Patrick Colledge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Richard Collins

Full name: Richard Collins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo 20 is much closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of the town would therefore be the preferred choice of the residents of Exmo 20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo 20 for housing allocation should be selected, one which would be deemed available, achievable and suitable in the Housing and economic land availability assessment. Exmo 20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo 20 being a supporting foraging habitat. Allocating Exmo 20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the Local Plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo 20 would harm to the heritage assets at the Saxon/Norman/Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting that currently exists, contrary to POLICY HE02.

Exmo 20 would have a detrimental effect on this open countryside site and adjacent internationally designated wildlife sites, eliminating "tranquility, wildness and dark skies", contrary to POLICY OL01.

Exmo 20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo 20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulation Assessment of 30/01/25 states that there is "currently not sufficient certainty to rule out adverse effects in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test.

Development of Exmo 20 on heavy clay subsoil with ineffective soakaways would worsen the already identified flood risk along Withycombe Brook through Exmouth. This conflicts with POLICY AR01B.

Exmo 20 would increase car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. the isolated location provides unsustainable development as residents would need to travel much more than 800m to access key services and facilities, contrary to PARAGRAPH 11.6.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Terry Collins

Full name: Terry Collins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, it's unclear as to whether the draft plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.

- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport. Few buses and unreliable and expensive rail service
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- The small lanes around the village are inadequate to cope with the amount of extra traffic these developments will create.

Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade. Where are the children to be educated, surrounding schools are also near capacity.
- The NHS hub in Ottery St Mary is struggling to meet the needs of the visiting population of its surrounding villages, including Feniton.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. The blind bends on either end of this lane are especially dangerous.

- The land is sustainable farmland which is much needed.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.

- Removal of Otry_20 from the draft local plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

RF Collins, LA Collins and FHW Collins

Full name: RF Collins, LA Collins and FHW Collins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Honi_18 was a very late addition, should never have been allowed to go forward as it wasn't consulted on at reg 18 stage. Honiton Town Council or general public were not informed of this plan. There is a conflict of interest with agent Carter Jonas and Highways England and SLR and Highways England Carter Jonas are land agents for Highways England. SLR are road design planners for Highways England. My family have farmed Lambpark field for over 35 years. Access will be very dangerous if we have to cross a 3 lane road with tractor and the trailer is 24 foot long. Gateway is in the northeast corner of field. Please see map. Footpaths Hale Farm 12.13.14.15. Footpath 12 runs in next field to Honi_18. Footpath 15 runs from Hale farm up High to Springfield Road at the moment people have restricted views of open countryside. When we had lockdown covid 19 we counted 45 walkers in a four and a half hour period. RSPB bird survey a few years ago found many species of high conservation concern. Hale Farm has right of way through Hale Close farm to Pine Park Road on existing driveway. We wish to maintain this right. No new road crossing driveway. Hedgerows tree and bushes were cleared. Tree and bushes were thinned out of my brook about five years ago, without my permission. Town lakes field has a leat running through part of field. This is part of Honiton's old water supply. It used to run in an iron gutter down the high street known as the Honiton crystal. I do not see how houses on Honi_18 as the land is full of springs also has a high water table. I know properties still have right for this water. Put settlement boundaries to behind houses in Kings Road. Honi_14 Honi_39B Honi_14 previously had a planning application 93/P1265 rejected. Out objection is for Honi_14 and Honi_39B to be taken together. Rail bridge is very low and narrow, every time a vehicle hits a bridge it causes enormous disruption to train services. Trains are not allowed to pass over the affected structure until properly examined by a competent person, a process that may take many hours. Nothrcote hill road is only a small country road, not suitable to take anymore traffic. Many people use footpath 13, which goes through Honi_39B. This land has great landscape value. Please put settlement boundaries back to railway line as they were before?

Juniper Connal

Full name: Juniper Connal

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to BudleighSalterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth,

which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I do not believe the local population is genuinely being listened to and the people making the decisions have no understanding of the negative impact of the proposed plan

John Connolly

Full name: John Connolly

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Policies Map

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: The Exmouth Settlement Boundary at the area designated Bystock Village in the Exmouth Neighbourhood Plan has been changed.

This change is only shown in the Local Plan Policies Map and mentioned in the Settlement Boundaries Evidence Paper. It is not explicitly described in any of the Local Plan Chapters published online for Regulation 19 consultation but it fundamentally changes the basis for development on the north eastern edge of Exmouth.

The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and Exmouth Neighbourhood Plan (ENP) contrary to NPPF guidance. The proposal is thus unsound.

The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The made Exmouth Neighbourhood Plan is very clear that Bystock Village is "the last place the community wants to see development" (made ENP Plan). This protective position has been explicitly supported under the current LP&ENP policies and by the Planning Inspectorate in determining recent planning refusals. Creating ambiguity and specific conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so.

Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary at Bystock Village. The Evidence flaws are:

1. There are no community facilities, either extant or with permission, within the proposed new settlement boundary and so the area does not comply with settlement boundary criteria B2 as asserted in the Evidence. The boundary criteria have been incorrectly applied and the Evidence is incorrect and hence the Plan is unsound.

2. There are no allocations near the new settlement boundary, as stated in the Evidence. The basis for extending the settlement boundary as shown in the Plan is thus false and the Plan unsound.

3. The assertion that, other than allocations, the Old Bystock Estate is largely excluded from the settlement boundary is wholly misleading and untrue. The Evidence was presented to the Strategic Planning Committee who have thus been misled in the basis for decision making and the Plan is therefore unsound.

4. The new settlement boundary creates a direct and specific conflict with the made Neighbourhood Plan. The new settlement boundary enables no new strategic numbers of houses, it is not required by any Local Plan Policy and it is not required by the NPPF. It is however explicitly contrary to the heritage protection policies in the made Neighbourhood Plan. The Neighbourhood Plan is not out of date and there is no evidence that its heritage protection policies need to change. Creating explicit and unnecessary policy conflict between a new Local Plan and made Neighbourhood Plan is contrary to NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.

5. The only outcome of the proposed settlement boundary change is to change a smooth and soft settlement boundary into a crude, irregular penetration into the countryside. The enabling of infill housing will eviscerate the heritage protections in the made Neighbourhood Plan and result in the obliteration of the unique “sense of place” that currently exists in Bystock Village. It will also irrevocably destroy the original spatial and architectural integrity that currently surrounds the Grade 2 listed Bystock Court.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The simplest solution is to remove the proposed settlement boundary change, returning the Exmouth Settlement Boundary at Bystock Village to its existing position (Local Plan 2013-2031). This modification would require no other changes to any element of the proposed Local Plan.

The outcome would be wholly consistent with the LP settlement boundary criteria and new LP Spatial Strategy; it would follow NPPF requirements; would be aligned with draft Strategic Policies 05 and 06; would be consistent with draft Heritage policies in the LP; would leave ENP heritage protection policies undiminished and leaves a wholly clear planning policy position that has already been specifically validated by previous Planning Inspectorate decisions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Connolly

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Policies Map

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: The Exmouth Settlement Boundary (ESB) at the area designated Bystock Village in the Exmouth Neighbourhood Plan (ENP) has been changed. This change is only shown in the Local Plan Policies Map and mentioned in the Settlement Boundaries Evidence Paper. It is not explicitly described in any of the Local Plan Chapters published online for Regulation 19 consultation but it fundamentally changes the basis for development on the north eastern edge of Exmouth. The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and ENP contrary to NPPF guidance. The proposal is thus unsound. The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The ENP is very clear that this heritage asset is not one in which they want to allow development. This protective position has been explicitly supported under the current LP&ENP policies by the Planning Inspectorate. Creating ambiguity and conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so. Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary (ESB) at Bystock Village. This Evidence:

1. Is based on an incorrect and inconsistent application of the agreed Settlement Boundary criteria B2 (Settlement Boundary Topic Paper) making the Plan unsound.
2. Makes false statements about the congruent relationship of the new ESB with nearby Allocations making the Plan unsound. The change actually creates an irregular and discordant settlement boundary that penetrates the surrounding countryside.
3. Makes factually misleading statements about what is excluded from the ESB at Bystock Village making the Plan unsound.
4. Fails to follow NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.

5. Introduces a wholly avoidable and unnecessary Policy conflict between LP and ENP making the Plan unsound.

6. The proposed change adds no value to the new LP and fails to present a coherent rationale as to why the change should override explicit Heritage protection policies within the made Neighbourhood Plan.

The attached paper outlines the complete detail of each of these objections.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The simplest solution is to remove the proposed settlement boundary change, returning the Exmouth Settlement Boundary at Bystock Village to its existing position (Local Plan 2013-2031). This modification would require no other changes to any element of the proposed Local Plan.

The outcome would be wholly consistent with the LP settlement boundary criteria and new LP Spatial Strategy; it would follow NPPF requirements; would be aligned with draft Strategic Policies 05 and 06; would be consistent with draft Heritage policies in the LP; would leave ENP heritage protection policies undiminished and leaves a wholly clear planning policy position that has already been validated by previous Planning Inspectorate decisions.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The proposed settlement boundary change near Bystock Village creates a specific policy conflict between Local Plan and Neighbourhood Plan for no good reason. There has been no meaningful discussion of the relative benefits versus negative outcomes between Local Plan Authority and Exmouth Town Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The Evidence presented clearly demonstrates that the LPA has not correctly applied due process. It also has not meaningfully engaged in consideration of the impact of the boundary change, the resulting explicit policy clash and the relative priorities of new LP and existing ENP.

It is clear that the LPA cannot be relied on to represent the specific issues at Bystock Village in a balanced manner.

Sophie Cook

Full name: Sophie Cook

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 23 and Policy OL09

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove SD01 dev within Exmouth Maer lane STW catchment from the local plan. Even if it is addressed by SWW OFWAT processes meant that such improvements cannot be completed in the next 8 yrs To allow development of these locations prior to infrastructure expansion is to knowingly enable create and add to the sewage pollution of Exmouth river, sea and streams.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed allocation in Exmouth are within a town that is already unable to cope with the amount of sewage in its out dated and broken sewage treatment network. Which means you will be contravention of Policy SP07 & SP08 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove site Exmouth 20 from the local plan. The policy doesn't take into account the already acknowledged failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. EDDC have issued notice of a civil emergency and a vote of no confidence in SWW because of the well publicised sewage infrastructure failures across Exmouth 2019 to 2025 To not acknowledge this issue despite EDDCs clear knowledge of these problems is highly irresponsible.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mr. Peter John Cook

Full name: Mr. Peter John Cook

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at EXMOUTH-20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA) . Developing Exmouth-20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmouth-20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

emma cooling

Full name: emma cooling

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I believe the development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sue Cooper

Full name: Sue Cooper

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.32

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: None

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Support for East Budleigh Settlement Boundary –SPO5 para 3.32 and the settlement boundary shown on CSD-002 - Local Plan Interactive Policies Map based on the methodology outlined in the The Settlement Boundaries Topic Paper and the site assessment undertaken by East Devon.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: None

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

Heidi cooper

Full name: Heidi cooper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the 'tranquility, wildness and dark skies' which is contrary to POLICY OL01. Exmo_20 would cause harm to the heritage assets most notably St John in the Wilderness Grade 2 listed church, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02. Development of Exmo_20 on heavy clay subsoil would exacerbate the already identified downstream risk along Withycombe Brook, which is already under additional pressure from climate change and development. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated position provides unsustainable development as residents would need to travel further than 800m to existing services, contrary to PARAGRAPH 11.6. It is too far and too steep from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. An alternative site to Exmo_20 for housing allocation should be selected which is closer to the existing cycle path and existing shops and further away from the Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Sue Cooper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Support for Policy SD16 and the findings of the background evidence reports SAL-001, SAL-002, SAL- 003 and SAL- 004 and SAL-015 Site selection report for East Budleigh. The site has been identified as suitable, available, achievable in the HELAA; in a suitable location; not already allocated in a ‘made’ Neighbourhood Plan; and not already have planning permission. However as the development would constitute ‘major’ development (as defined by the local authority according to the NPPF) in a National Landscape, to justify the “exceptional circumstances” for allocation the Policy to be sound should also stress the need to ensure affordable housing is provided to meet the identified needs of the village. Given the sensitivity of the site it is welcome the policy recognises a high quality development scheme is required it is suggested a masterplan is provided by the developer prior to planning permission being granted to enable consultation on a preferred locally distinctive and high quality design with the Parish Council and residents to ensure planting and open space provision is located to minimise the impact on the landscape, Syon House and to protect the amenity of the occupiers of adjoining residential properties on Frogmore Road. This in accordance with Strategic Policy DS01 of the Local Plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A high-quality and locally distinctive development scheme is required for this prominent site noting its location in the East Devon National Landscape area and proximity of the Syon House as

a non-designated heritage asset. Crossing provision over the B3178 should be provided for pedestrians and overhead wires across the site should be relocated underground. New and existing planting and open space should minimise the impact on the landscape, Syon House and protect the amenity of the occupiers of adjoining residential properties on Frogmore Road. Prior to planning permission being submitted it is expected the developers will provide a masterplan for consultation to the Parish Council and residents (particularly the immediate neighbouring properties,) to allow input into the design for the site. The provision of affordable housing to meet the identified needs of the village will be required.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sue Cooper

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: To ensure the Local Plan is sound the text 'Any windfall site across any part of East Devon, inside or outside settlement boundaries, that is not allocated for housing development' should relate only to windfall sites inside settlement boundaries. Otherwise this will create confusion with Exception Housing Policy HN10 and Strategic Policy SP06. The latter policy aim is to direct development to sites within settlement boundaries and the former policy seeks to permit community led affordable housing schemes on sites adjacent to settlement boundaries. Exception schemes would be difficult to achieve as when an exception site is an exception site and when is it a windfall site subject to Policy HN02. This aspect of the policy is thus inconsistent with the aims of the Local Plan to maximise affordable housing provision. To take out the reference to outside the village boundaries provides greater clarity.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Any windfall site across any part of East Devon, inside settlement boundaries, that is not allocated for housing development.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sue Cooper

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Why is the percentage 30% and not 35% on all sites? It creates confusion in that allocated sites are 30% but windfall sites are 35% in most villages.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Percentage should be 35% on windfall sites to avoid confusion and to achieve the aim of the Local Plan to maximise affordable housing provision

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sue Cooper

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: It is unclear why the threshold is 6 or more dwellings in designated rural areas and not a lower threshold as permissible NPPF para 65. A lower threshold would be more likely to achieve more affordable housing consistent with the aims of the Local Plan. This is particularly the case in smaller tier 4 villages where a threshold of this size is rarely achieved on non-allocated sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Threshold of 5 or more dwellings in designated rural area.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sue Cooper

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN10

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Exception sites should only be based on the need in the host parish and abutting parishes if they are of same or lower tier in the settlement hierarchy otherwise smaller settlements could have to accommodate the need of larger nearby villages or small towns which are more sustainable. This is not sound as it is contrary to the aims of the spatial strategy. i.e. An East Budleigh exception site could be justified by the need of a much larger and sustainable settlement of Budleigh Salterton or indeed the village of Woodbury.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Provide affordable housing meeting a proven, unmet need of the local community, noting that such need may be addressed through local plan allocations. Need can be evidenced by a Housing Needs Survey or other local data such as a Neighbourhood Plan, Parish Survey or Parish Plan. Need is to be based on that existing in the host Parish where the proposal falls but can include need arising from any immediately abutting parish, excluding those falling in Tiers 1 or 2 of local plan policy and where an immediately abutting parish is higher in the settlement hierarchy than the host parish; and

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Richard Cord

Full name: Richard Cord

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Whilst we respect the development needs to expand into the future we object to the proximity of the suggested development so close and adjacent to our property

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I have attached the relevant local plan and it is proposed that “New settlement – Option 2 Alternative choice” be implemented.

With so much vacant land in the area to be used first, utilizing this land adjacent to our property in close proximity would be wrong and detrimental to the sustainability and wellness of the existing properties.

Paul R Corder

Full name: Paul R Corder

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. * This area, which is largely undeveloped does not have any of the required infrastructure for housing (water, sewers, power etc etc) nor does it have good transport links. Roads in the area are overloaded and not only a poor state of repair but insufficient to cope with the

additional commuter traffic (presumably to Exeter & beyond). * Reduce the size of Exmo_20 * Do not access the site via the B3179

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: * Reduce the size of Exmo_20 * Do not access the site via the B3179 * Do not access the site via Southern Wood

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Margaret Cornish

Full name: Margaret Cornish

Other party name (if relevant): Westhaven

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Forms done in a way that some individuals unable to understand in a legalistic and bureaucratic way making it difficult to complete, as well as some non computer literate or lacking suitable equipment. A petition signed by 500 residents not taken into consideration at Strategic Planning Committee id not report. These comments I feel make it undemocratic.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Correct and listen to the above comments.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Lack of sustainability. Nothing changed from 2014 super inquiry except flood prevention scheme which does not address other issues in village. Roads around village especially unsuitable for heavy traffic especially HGV's. Railway crossing has four roads leading onto it which causes back up on roads leaving to it at busy times. More traffic more chaos!! Pattersons Cross floods more flooding there village road out will used not suitable.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Angela Cottrell

Full name: Angela Cottrell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please find attached comments regarding planning to build houses on the sites whim_11 and whim_8

Objection to Proposed Development WHIM_11 (33 Houses on the Old Cricket Pitch, Whimble)

Dear East Devon District Council Planning Department,

I am writing to object in the strongest terms to the proposed development known as WHIM_11, which seeks to build 33 houses on the old cricket pitch in Whimble. This site has been subject to multiple planning applications in the past — all of which have rightly been refused. The reasons for those refusals remain entirely valid and are, if anything, even more pressing today.

Flood Risk and Environmental Impact: The WHIM_11 site includes land that floods frequently. The adjacent fields are often waterlogged, and the stream at the bottom of the field has overflowed multiple times this winter alone. With increasingly unpredictable and extreme weather events, this area is wholly unsuitable for residential development. Building here will raise the risk of flooding to nearby homes and put future residents at unnecessary risk. The unsuitability of this site for development due to flood risk has already been acknowledged by the East Devon local plan.

Land of Local Importance: The site is designated as land of local importance, which should offer it protection from speculative development such as WHIM_11. This status is in place to safeguard green spaces that matter to the local community. Ignoring this designation would contravene East Devon planning policy and weaken trust in the planning system.

Protected Species and Wildlife Habitats: The area surrounding the WHIM_11 site supports diverse wildlife, including legally protected species. Bats are regularly seen foraging and commuting across the site, and otters have been spotted using the stream. Both species are protected by law, and any disturbance to their habitat from construction would be highly damaging — and potentially unlawful.

Trees and the Natural Landscape: The site contains a historic oak tree and several other mature trees with Tree Preservation Orders. These trees form an important part of Whimble's natural and visual heritage and provide crucial habitats for local wildlife. The risk of damage to them during construction is high, and their loss would be a significant and irreversible blow to local biodiversity.

Road Safety and Traffic Concerns: Whimble's narrow lanes and limited pavements make it wholly unsuitable for increased traffic volumes. In many parts of the village, only one car can pass at a time. The addition of 33 homes — potentially bringing 60+ cars — would lead to congestion, safety risks for pedestrians, and increased pollution in a village where walking is already compromised. Crucially, any future proposals should avoid bringing additional traffic through the centre of Whimble, where the infrastructure is simply not capable of safely accommodating it.

Unsuitable Infrastructure and Strain on Local Services: Whimble does not have the capacity to support a development of this size. Public transport bus links are limited, parking is scarce, and services such as schools and GP practices are already stretched. In contrast, nearby Cranbrook has been specifically developed to accommodate housing growth. It has modern infrastructure, designated expansion areas, and services designed to absorb additional demand. Directing development there is far more appropriate and sustainable.

Loss of Green Space and Village Character: The old cricket pitch is part of Whimble's heritage and rural charm. Green spaces like this are becoming increasingly rare, and their loss cannot be reversed. Allowing WHIM_11 to go ahead would fundamentally alter the character of the village and erode the community's identity.

In summary, WHIM_11 represents an unsustainable, inappropriate, and damaging development for Whimble. It conflicts with environmental protections, places unacceptable pressure on local infrastructure, and would significantly harm the fabric of this rural village. I strongly urge the Council to reject the application once again, in line with previous decisions and the views of the local community.

Full name: Angela Cottrell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Old Cricket pitch which is the land being proposed to be built on is subject to a Land of Local Importance designation. This therefore prohibits the use of this land to be built on for the purpose of dwellings.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There should be no dwellings built on the Land of Local importance.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This proposal is not sound as it is not justified compared with other proposals. The risk to the village of increased traffic through the village is not justified compared with other proposals that would keep traffic to the outskirts of the village or the outskirts of Cranbrook. There is no solid evidence that this proposal at whim_11 is the most appropriate and it has been acknowledged that there is significant risk of flooding in this area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: No development should increase traffic through the centre of Whimple. Any development should be on the extreme outskirts which is closer to bus links.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Impact on the environment: the proposal acknowledged the risk of flooding. The stream at the bottom of the field regularly floods and has flooded a record number of times this winter. There are a number of protected trees within this field which are the habitat for wildlife including woodpeckers and squirrels. In addition otters have been seen in the Slewton Crescent area near the stream backing onto the field and bats are commonly seen. Both species are protected by law. With regards to infrastructure the impact of potentially 60 more vehicles through the village carries significant risk to residents as there are no complete pavements and both children and elderly residents are particularly at risk. Planning permission has been declined on this site three times in the past therefore it is impotent to consider alternate options.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Marie Cowdrey

Full name: Marie Cowdrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building - National Heritage and Coastal Preservation area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area (tourism that the town depends on), along with causing devastation to the local wildlife living there. It would also create a precedent that could destroy further areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be within the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. There is also The ongoing sewage issue and general lack of infrastructure required to expand The town. The proposal to build industrial units next to the main road, the entrance way into the town from the East, is incogruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road only had one exit (into the main road) and would go straight across the the old railway line which is a popular and well used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of wellbeing and enjoyment. It would not be in the best interest of Exmouth to allow building on Exmo_17.

Dawn Cowler

Full name: Dawn Cowler

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I am writing to you with great concern regarding the proposed new settlement covering land at Farringdon, East Devon. The village of Farringdon is a lovely rural place to live at present, but the threat of a new town has caused great concern to its residents who have chosen to live here so that they can enjoy its peace and tranquillity. A new town, swallowing up the countryside and its rich wildlife, would have a devastating impact on the village, and would change it forever. I realise that the government is pushing District Councils to build houses, but surely using any brown field sites should be their first priority, rather than destroying prime agricultural land that has served its people for thousands of years. Denbow is in fact mentioned in the Domesday Book, and is threatened by having a proposed new town built around it. This beautiful property, as well as other listed houses within the village, should be protected, not ruined. It just doesn't make sense! I am pleading with you to do all you can in your power to prevent this proposal going ahead. Only recently we read that it looks as though the population is likely to reduce drastically in the coming years. I have lived here all my life, as have generations of my family before me, and cannot bear this beautiful area to be destroyed. Yours Sincerely

David Cowler

Full name: David Cowler

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As a resident of Farringdon I am extremely disappointed at the way the new town has been pushed through despite objections from local residents at the previous two consultations. This area was chosen because of a local landowner buying up the land then making it available to the council. I understand committee members did not make themselves available to even inspect the area. Because we are only a small parish we have been totally ignored. The area involved is unspoilt rolling farmland with the wildlife that goes with it. The draft local plan itself seems ok if the town was to go ahead but that is not the point.

Mrs Natasha Cox

Full name: Mrs Natasha Cox

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Jackie Cox

Full name: Jackie Cox

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths. If positioned on this site it would destroy the “tranquillity, wildness and dark skies” of the countryside. Given the location it would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, etc) would be the obvious choice for residents of Exmo_20. This would be detrimental to the community of Budleigh Salterton and would need to be considered in conjunction with the development of Budleigh Salterton. I consider that it is essential to assess the site with consideration given to the infrastructure of Budleigh Salterton and the effects this development would have on Budleigh Salterton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As it affects the Settlement of Budleigh Salterton due to it's proximity to the services and the town, being closer to Budleigh Salterton than Exmouth, it needs to be modified to include how the development affects Budleigh Salterton and include how these effects will be mitigated.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

RICHARD MALCOLM CRABTREE

Full name: RICHARD MALCOLM CRABTREE

Proposal:

1. Introduction

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Yes

3. Do you consider that this part of the Introduction chapter is sound?: Yes

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: Yes

Full name: RICHARD MALCOLM CRABTREE

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Table 1

2. Do you consider that this part of the vision chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the vision chapter, please use this box to set out your comments.: How are you going to ensure our rivers in East Devon and sea are not as badly polluted as they are now?

3. Do you consider that this part of the vision chapter is sound?: Yes

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See 2a above.

4. Do you consider that this part of the vision chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the vision chapter fails to comply with the duty to co-operate. Please be as precise as possible.: You should mention which organisations you intend to co-operate with to achieve objective 8. It seems to me that you cannot do this alone.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

Carole Crandon

Full name: Carole Crandon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD13

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This does not consider the lack of infrastructure in the village or the detrimental effect on the elderly population. It equates to a 14% increase in population which cannot be supported by a village of this size.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The assigned area is green fields which would be lost forever alongside the wildlife which inhabits the area. England is already one of the most severely nature depleted in the world with only 53% of its biodiversity remaining.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The road into the village is too narrow to accommodate more traffic. Following such a development the additional vehicles using the fragile road system would make living in the village intolerable. The village is only able to sustain the shop due to the support of the villager both practically and financially. If they withdraw their support or the Post Office no longer has a counter there the shop will need to close.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There is an empty public house that is rapidly deteriorating, it would make far more sense to develop this land. There is also some derelict industrial units that could similarly be used if further land was required.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Such a population increase would make the road into the village unusable for local people to walk along. This includes many dog walkers and parents taking their children to school.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Karen Crawford

Full name: Karen Crawford

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP07

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: EDDC are fully aware that the sewage network infrastructure is already beyond capacity to cope yet have not given adequate focus to this in the Local Plan. A previous Water Cycle Study (circa 2010) commissioned by East Devon District Council (EDDC) was predicated on the building of a new waste water treatment works (WWTW) to serve the new Cranbrook community. This plan was subsequently dropped by South West Water and the sewage diverted to Countess Wear. This study specifically assessed the projected capacity for waste water treatment over the coming years and (with the inclusion of the new works) concluded that several locations would be over capacity by 2025 including Maer Lane STW. Since the time of the study the new WWTW was not built, the population in East Devon has increased by more than twice the national average (Census data 2011 -21) and the published performance data in Exmouth shows a large increase in the use of storm overflows discharging untreated sewage into the sensitive estuary and designated bathing waters. This clear evidence, of an already inadequate sewerage infrastructure, is entirely missing from the draft Local Plan. The council wrote to Government last year citing the situation as an 'civil emergency' yet this is not reflected in the Local Plan. It would also appear that EEDC has failed to comply with section 33A of the PCPA which requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. We know that a follow up Water Cycle Report has been Commissioned by EDDC and was due to be completed last year but this does not appear in the draft Plan and has not been shared with the community. This new Water Cycle Study is a key part of the evidence required for the Local Plan going forward to reflect how this will ensure adequate capacity for waste water treatment in East Devon. We urge the Planning Inspector to consider these omissions and request urgent action by EDDC in conjunction with South West Water to address and assess sewage

infrastructure future capacity. We can submit further evidence to support this if required.

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: A full and detailed review of the Exmouth sewage infrastructure is urgently needed before any more development can take place. We cannot rely on promises from South West Water of future improvements. EDDC need to learn from recent history. We all know that South West Water promised to build a sewage treatment works at Cranbrook which they failed to delivery. Current suggestions of expanding the Exmouth treatment works cannot be relied upon. EDDC know the existing infrastructure is already insufficient for current needs without another 3000 homes adding to the problem.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: As above. Exmouth Sewage Infrastructure needs a full investigation

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As above. Exmouth Sewage Infrastructure needs a full investigation

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Geoff Crawford

Full name: Geoff Crawford

Organisation (where relevant): ESCAPE

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP07

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: It appears that EEDC has failed to comply with section 33A of the PCPA which requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies including South West Water over strategic matters during the preparation of the plan.

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We know that a follow up Water Cycle Report has been Commissioned by EDDC and was due to be completed early 2024 but this does not appear in the draft Plan and has not been shared with the community.

This new Water Cycle Study is a key part of the evidence required for the Local Plan going forward to reflect how this will ensure adequate capacity for waste water treatment in East Devon.

The previous report dated 2010 clearly highlighted that Exmouth sewage treatment capacity was already significantly exceeded. We know that considerable additional housing, population growth and water usage means that things can only have gotten worse. Indeed the continuing increasing frequency and duration of untreated sewage overflows at Exmouth demonstrates that.

We also know that there has been no expansion of sewage treatment capacity.

Without the new report being available we must rely in the old report to inform us and that report and likely the new report both state that the proposed expansion of development within the Local Plan exceeds both the current and projected treatment capacity.

By presenting this Local Plan whilst knowing that infrastructure cannot and will not cope with the proposed expansion EDDC are being negligent at best and wilfully irresponsible in not completing their statutory duties.

I would strongly urge the Planning Inspector to consider these omissions and request urgent action by EDDC in conjunction with South West Water to address and assess sewage infrastructure future capacity.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: In conjunction with a large group of East Devon residents I am concerned the consultation may not be based on sound evidence in relation to the waste water infrastructure in the area.

A previous Water Cycle Study (circa 2010) commissioned by East Devon District Council (EDDC) was predicated on the building of a new waste water treatment works (WWTW) to serve the new Cranbrook community. This plan was subsequently dropped by South West Water and the sewage diverted to Countess Wear. This study specifically assessed the projected capacity for waste water treatment over the coming years and (with the inclusion of the new works) concluded that several locations would be over capacity by 2025 including Maer Lane STW. Since the time of the study the new WWTW was not built, the population in East Devon has increased by more than twice the national average (Census data 2011 -21) and the published performance data in

Exmouth shows a large increase in the use of storm overflows discharging untreated sewage into the sensitive estuary and designated bathing waters. This clear evidence, of an already inadequate sewerage infrastructure, is entirely missing from the draft Local Plan. The leader of the council wrote to Government last year citing the situation as an ‘emergency’ yet this is not reflected in the Local Plan.

We know that a follow up Water Cycle Report has been Commissioned by EDDC and was due to be completed last year but this does not appear in the draft Plan and has not been shared with the community. This new Water Cycle Study is a key part of the evidence required for the Local Plan going forward to reflect how this will ensure adequate capacity for waste water treatment in East Devon.

I would strongly urge the Planning Inspector to consider these omissions and request urgent action by EDDC in conjunction with South West Water to address and assess sewage infrastructure future capacity.

If required I would be happy to submit further evidence to support this.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The Local Plan MUST acknowledge the failures of the sewage network infrastructure. It must also address them. It must complete and publish the water report to prove its proposal sound or remove those proposals specifically in the Exmouth STW catchment from the plan.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: EDDC and SWW are in open disagreement about sewage treatment capacity, failed and aging infrastructure. A Water report stating the true situation is not available and so cannot be referenced as evidence.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : EDDC have made a clear, conscious decision to ignore what they know to be true. EDDC issued notice of a civil emergency due to sewage pollution August 2024. EDDC gave a vote of no confidence in SWW due to sewage overflows, pipe bursts, tanker traffic etc in February 2024. EDDC are fully aware that the SWW sewage network and infrastructure cannot cope with the proposed expansion plans. If the public and campaign groups who have gathered and presented the data are not allowed to participate in highlighting the shortfalls and failings then who will highlight what EDDC have chosen to ignore?

Full name: Karen Crawford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The consultation may not be based on sound evidence in relation to the waste water infrastructure in the area. A previous Water Cycle Study (circa 2010) commissioned by East Devon District Council (EDDC) was predicated on the building of a new waste water treatment works (WWTW) to serve the new Cranbrook community. This plan was subsequently dropped by South West Water and the sewage diverted to Countess Wear. This study specifically assessed the projected capacity for waste water treatment over the coming years and (with the inclusion of the new works) concluded that several locations would be over capacity by 2025 including Maer Lane STW. Since the time of the study the new WWTW was not built, the population in East Devon has increased by more than twice the national average (Census data 2011 -21) and the published performance data in Exmouth shows a large increase in the use of storm overflows discharging untreated sewage into the sensitive estuary and designated bathing waters. This clear evidence, of an already inadequate sewerage infrastructure, is entirely missing from the draft Local Plan. The council wrote to Government last year citing the situation as an ‘civil emergency’ yet this is not reflected in the Local Plan. It would also appear that EEDC has failed to comply with section 33A of the PCPA which requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. We know that a follow up Water Cycle Report has been Commissioned by EDDC and was due to be completed last year but this does not appear in the draft Plan and has not been shared with the community. This new Water Cycle Study is a key part of the evidence required for the Local Plan going forward to reflect how this will ensure adequate capacity for waste water treatment in East Devon. We urge the Planning Inspector to consider these omissions and request urgent action by EDDC in conjunction with South West Water to address and assess sewage infrastructure future capacity. We can submit further evidence to support this if required.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: EDDC have to acknowledge that the sewage infrastructure is already beyond capacity and therefore cannot support the proposed housing development. EDDC need to demonstrate the necessary infrastructure is in place to cope and provide the relevant reports and evidence of this.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As above. Inadequate sewage infrastructure exists.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As above. Provide evidence that sewage infrastructure can cope before more development takes place.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As above, A full review of the sewage infrastructure capacity has to take place. EDDC cannot rely on future promises of South West Water.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Geoff Crawford

Organisation (where relevant): ESCAPE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;
2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;
3. Harbours, estuaries or the sea;

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed housing allocations in Exmouth ... A town currently with insufficient sewerage

infrastructure, demonstrably broken sewage network and demonstrably under capacity of the sewage treatment facility so without economically unviable investment for a site, the allocations would be contrary to POLICY SP07 & SP08 (and associated paragraphs) of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy does not take into account the already acknowledge failure of the sewage network infrastructure and overwhelmed treatment capacity of the Maer Lane sewage treatment works. The policy does not even refer to the many issues that all acknowledge. EDDC have issued notice of a "civil emergency" and a "vote of no confidence in SWW" because of the nationally publicised sewage infrastructure failures across Exmouth from 2019 to 2025. To not even acknowledge this issue, despite EDDCs clear knowledge of the problems is highly irresponsible.

Policy 23 - Infrastructure Delivery: This policy outlines the requirement for necessary infrastructure, including wastewater management systems, to be in place to support new developments. It ensures that housing growth is aligned with the capacity of existing or planned infrastructure to prevent overloading of systems.

Policy OL09: Control of pollution Permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates, including: smell, fumes, dust, grit, smoke and soot; B. Pollution of surface or underground waters, for example by untreated sewage, including discharges to:

1. Rivers, other watercourses, water bodies and wetlands;

2. Water gathering grounds including water catchment areas, aquifers and groundwater protection areas;

3. Harbours, estuaries or the sea;

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: EDDC are aware of the failure and under capacity of the sewage network infrastructure across Exmouth. However, they have chosen not to highlight that within the Local Plan and indeed have ignored this most important or infrastructure requirements. I feel it necessary therefore to present the evidence of this failure.

Teresa Creton

Full name: Teresa Creton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The access point on to the B3179 would be exceedingly dangerous. It is a very busy, fast road There will be no infrastructure to support people who would need to travel into Budleigh. The school, doctor's surgery and shops are already oversubscribed. Limited shops. Extra traffic not suitable for the one road in and out of Budleigh. People would be reliant on cars as public transport insufficient. Too steep and dangerous road for cycling. Too far to walk. There would be a severe negative effect on Pebblebed Heath Nature Reserve at Withycombe Raleigh Common.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan. Do not access the site via the B3179. Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mrs Polly Anna Crofts

Full name: Mrs Polly Anna Crofts

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less harm to pebbled heaths and the wildlife specific to these areas. Developing EXmo_20 is contrary to POLICY PB01. Exmo_20 would destroy the "tranquillity, wildness and dark skies of the countryside (Policy OL01) and would destroy wildlife corridors contrary to paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable veteran trees and hedgerows (contrary to paragraph 13.9). There is already too much congestion in the lanes around this area and more housing would increase pressure on roads that are already dangerous due to poor visibility at junctions and sharp bends.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan before you turn Exmouth into a sprawl and undermine the community already here.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Gillian Croney

Full name: Gillian Croney

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid

rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I do not believe that it is possible to provide adequate modifications to make Sidmouth-31 a viable development. The only acceptable solution is to reject this site and focus on more suitable sites elsewhere. For just 15 houses - it makes much more sense to leave this field as National Landscape and build elsewhere. Otherwise once these 15 get built you'll then set a precedent to build some more next door and so on until the countryside is lost forever. Countryside which brings thousands of visitors to Sidmouth every year. We are meant to be protecting the local wildlife & countryside not destroying the delicate ecosystem that we currently enjoy.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I feel very strongly about the need to block this development and believe that I need to be at all hearing sessions to be fully knowledgeable about future developments and to feedback my concerns. There is mention of a protest group specific to Sidmouth-31 for which legal representation is being investigated - which I intend to join adding another reason to request participation.

kirsty anne cross

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

"vehicular access, to accomodate modest levels of development, will be allowed for southern site parts from the road 'southern Wood' ...primary vehicle access to the site, serving the large majority /large bulk of development will be from the B3179 to the north. This directly contradicts the National planning policy framework page 33. point 115b "safe and suitable access to the site can be achieved for all users"

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: reduce the size of the development to the original exmo-20b lower site

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot

simply be mitigated by planting new trees. Exmo_20 also contains many long-established hedgerows across the site, the lengths of which are considerable.

The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network,

part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. We have documentation of badgers, foxes, Otters, dormice, tawny owls, brown long eared bats, pipistrelles and more all using this area from Southern Wood upward toward the heath for foraging and predating. early purple orchids are also present in the fields.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath. If the new development goes ahead and inevitably links the site from Southern Wood to the B3179, the quickest route to Exeter will be through there from many areas of Exmouth which will increase traffic at an earlier point along the B3179, currently most traffic travels up higher marley road or past Kings garden centre.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative sites which would cause less or no harm to the Pebblebed Heaths. Of all the sites put forward this site will cause the most harm to the prbblebed heath with its close proximity to the protected site, dog walkers regularly leave dog faeces on the common which over nutrifies the soil which is harmful to the flora and fauna which needs a nutrient deficient environment, increased dog walking is inevitable if you develop across the road from the protected site. (SAC/SPA).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: revert to exmo20-b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 3.34. Although Exmouth is classified as a Tier 1 settlement, it lacks the necessary infrastructure and services to support its current population. While the proposed development may contribute financially towards infrastructure, it will not provide an additional doctor's surgery or dental practice—both of which are already insufficient for Exmouth's residents. Furthermore, no new secondary school will be established; in recent years, many children have been forced to travel to Cranbrook due to the lack of capacity at Exmouth Community College.

Additionally, Exmouth's sewerage system is severely inadequate, leading to frequent discharges into the sea, resulting in regular beach closures. This issue has been highlighted in national news multiple times, underscoring the severity of the problem and we are taking legal action against SWW. Paragraph 3.34 states that directing growth to Tier 1-4 settlements ensures development occurs in areas with existing infrastructure and services. However, Exmouth's current deficiencies contradict this principle.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with paragraph 11.6, as it qualifies as a "larger" development. The majority of the site is situated beyond 800 meters (approximately a 10-minute walk) from any existing key services and facilities. Additionally, there are no proposed plans to introduce significant key services within the site, meaning residents will likely need to drive over two miles via the B3179 to access essential amenities in Exmouth or nearby settlements.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove exmo-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 conflicts with policy SP01. Although Exmouth is classified as a Tier 1 town, Exmo_20 is located four miles by car from Exmouth town centre, from where I live in Southern Wood it is quicker for me to drive to Budleigh to the shops than to Exmouth Town centre.

Exmouth is unsuitable for further significant growth due to its geographical constraints. Positioned on a peninsula between the River Exe and the coast, the town centre lies at the southern end, preventing 360-degree expansion. Existing development has already spread a considerable distance from the town centre, making any new development closer to neighboring towns and villages rather than reinforcing Exmouth as the principal centre. Consequently, development at Exmo_20 would be too far removed from the town to be sustainable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove EXMO-20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: On page 78 of the draft local plan, the paragraph states "Vehicular access, to accommodate modest levels of development, will be allowed for southern site parts from the road 'Southern Wood', subject to detailed assessment of highway access acceptability and objective review of local road and junction capacity and with mitigation provided to address unacceptable adverse impacts. Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the north. High quality, safe and attractive to use pedestrian, cycle and public transport access, particularly providing southerly site links into Exmouth and to nearby services, facilities and job opportunities, will need to be an essential part of the overall development scheme". I have concerns about what mechanisms will be put in place to prevent private cars from the upper site accessing roads where public transport buses will use to travel through southern wood and into meadow view road, therefore the whole site will be accessible by car through these two already congested roads, the on street parking in these roads with private vehicles is heavy, with cars parked on pavements through many areas, pedestrian access with prams and mobility scooters are forced into the road to pass. Buses through meadow view and southern wood will be difficult to progress with cars parked on both sides making it very narrow.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Access through Southern Wood will have a cumulative impact on other developments in the area; and proximity to the SSSI environmental designation on the B3179 side of the site is within 400m of the protected site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. As a resident of Southern Wood, I find it quicker to drive to Budleigh for the beach and facilities than to drive to Exmouth beach.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. It contradicts the report commissioned in 2016 which indicates 91% of visitors came to the common by car, this development will place humans within a 10 minute walk and threaten the ecosystem with over visitation and dog foul being left to over

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: kirsty anne cross

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be located on an alternative site where it would cause no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo 20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: 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

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

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.

A Crowhurst

Full name: A Crowhurst

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development at Exmo_20 is fundamentally flawed and poses a significant threat to the local environment, community, and infrastructure. It stands in direct conflict with multiple policies in the Local Plan and would cause irreversible harm. Here's why Exmo_20 must be rejected:

Destructive to Protected Habitats The development could and should be relocated to an alternative site where it would cause minimal or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 directly contradicts POLICY PB01 of the Local Plan and fails to align with the agreed mitigation strategy. Protecting these sensitive and legally protected habitats is not optional—it is essential.

Loss of Tranquillity, Wildness, and Dark Skies Exmo_20 would permanently destroy the peaceful, unspoiled character of the countryside, undermining the “tranquillity, wildness and dark skies” that define this rural landscape. This is a direct violation of POLICY OL01.

Destruction of Biodiversity and Wildlife Corridors The development would fragment and isolate crucial wildlife corridors, endangering irreplaceable habitats, veteran trees, and species-rich hedgerows across the site. This is in direct conflict with PARAGRAPH 13.23 and PARAGRAPH 13.9 of the Local Plan, which mandate the protection of these vital ecological features.

Failure to Meet Habitat Protection Requirements The Habitats Regulations Assessment (dated 30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects on integrity” in relation to air quality within the East Devon Pebblebed Heaths SAC/SPA. Proceeding with the development would violate POLICY OL09 and POLICY PB04.

Harm to a Historic Church and Its Setting Exmo_20 would severely damage the historic setting of St John in the Wilderness, a Grade II* listed church. The proposed development would irreversibly alter the peaceful atmosphere of this sacred site, undermining the congregation’s ability to worship in tranquillity. This is contrary to POLICY HE02.

Increased Flood Risk Situated upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, Exmo_20’s subsoil of heavy clay would render soakaways ineffective, exacerbating flood risks downstream in Withycombe. This directly contradicts POLICY AR01B and exposes the community to increased flooding hazards.

Unsustainable and Isolated Development Exmo_20 would significantly increase car dependency and traffic congestion. It is too far (and too steep) from the nearest town centre for walking or cycling to be a viable option, forcing reliance on cars. This directly violates PARAGRAPH 11.2 and PARAGRAPH 11.6 of the Local Plan and conflicts with the goals of sustainable development outlined in POLICY TR01.

Encourages Unwanted Coalescence Between Budleigh and Exmouth The primary access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh’s infrastructure and services (including schools, doctors, and shops) the obvious choice for residents. This would create unwanted urban sprawl and the gradual merging of Budleigh and Exmouth, which is in clear violation of POLICY OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan, Revert to Exmo _20b as previously proposed.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Local resident of both Budleigh (in the past) and now Exmouth.

Andrew Cull-McMullan

Full name: Andrew Cull-McMullan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Although I do not oppose new residential developments in Honiton, and recognise their need, I have severe concerns regarding the proposed development on King's Road. I own a property further down the road, this does not back on to the site, however my concern is the impact this will have on traffic on the road. As a main trunk road it can be difficult, particularly in the summer to pull on to the road from our driveway. Currently, traffic can queue at the Waterleat Avenue junction to access the A35, the new development is proposed to access the main road, dead opposite, this will not be good for road users, both local and those passing through, and will likely lead to an accident, with Drivers attempting to 'go for it'. With the number of houses proposed in this development this will lead to a considerably increased risk. Some may suggest reducing the speed limit to 20mph, but this will make it even harder for residents to pull off their driveways. I could support the development if a bypass was considered, but I believe without any road layout changes, there is a considerable safety risk for a development of this size directly onto the A35. Many thanks.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A35 bypass in East of town.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure residents concerns are heard.

Quinton Cumbes

Full name: Quinton Cumbes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD22

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The paragraphs make the point that there needs to be a new footpath to link these two developments to the village and the development needs to be sensitively made due to the nature of the landscape.

1. A new footpath would be necessary as the road has no pavement beyond the roundabout there the Exmouth road (B3178) joins the A3052. It is dangerous to attempt to walk along the busy A3052 where there is no pavement, the road narrows at The Toll House, and traffic make no allowances for a pedestrian walking along the road.

2. The proposed development is a considerable way from the centre of the village. The centre of the village is not in the centre of the dwellings, it is skewed towards the eastern end of the village. The pub, church and primary school are all in the eastern edge of the village and even linking a new development to the existing footpath, it's still a long walk to these facilities.

3. It draws reference to the sensitivity of both sites. The land is steeply sloping up from the Exmouth road (B3178). It is part of the National Landscape (old A.O.N.B.)

therefore two new housing developments would be out of place in such a designated area.

4. The land is steep. When we had the severe rainfall event, May 2023 when 5 1/2 inches of rain fell in 3 hours (Environment Agency figures), I have photographs of the runoff from these fields, coming down the footpath from Badger Close and onto the Exmouth Road, B3178 where it caused a deep flood across the road. The footpath looked like a muddy river in spate, emptying out onto the corner of Exmouth Road (B3178). Changing these fields from agricultural land to a housing development would greatly increase the ability for the land to create runoff onto a busy road, the B3178. Non absorbent roadways, driveways and hard standings for cars would exacerbate this situation as the land which was once absorbent agricultural land would be unable to absorb such rainfall and so increase runoff.

5. The Exmouth Road, B3178, is a very busy road. Despite the best efforts of our local Speedwatch Team, traffic continuously speed on it, whether entering or exiting the village in what is a 30m.p.h. area. A further 55 houses in this location would increase traffic on this road and also be at risk entering their access road off the B3178. In particular, traffic leaving the village goes around the corner by Littledown Lane, then accelerates away along the straight part of the road exiting the village despite it still being a 30m.p.h. speed limit, and would be accelerating away where the access road to these developments would join the Exmouth Road.

For these reasons I consider the developments as described at SD22 Newt-04 and 05 to be unsound.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Alan Cunningham

Full name: Alan Cunningham

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid rules about positioning of reflective surfaces etc add substantial cost to any building

project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I do not believe that it is possible to provide adequate modifications to make Sidmouth-31 a viable development. The only acceptable solution is to reject this site and focus on more suitable sites elsewhere. For just 15 houses - it makes much more sense to leave this field as National Landscape and build elsewhere. Otherwise once these 15 get built you'll then set a precedent to build some more next door and so on until the countryside is lost forever. Countryside which brings thousands of visitors to Sidmouth every year.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I feel very strongly about the need to block this development and believe that I need to be at all hearing sessions to be fully knowledgeable about future developments and to feedback my concerns. There is mention of a protest group specific to Sidmouth-31 for which legal representation is being investigated - which I intend to join adding another reason to request participation.

Aubrey Curry

Full name: Aubrey Curry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whim_08- The EDDC strategic Planning Committee rejected the plans on grounds of unsuitability and no further grounds of justification have been proposed Therefore the grounds of unsuitability still stand.

Lisa Curtis

Full name: Lisa Curtis

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. ANOTHER FACTOR TO CONSIDER IS THAT THERE IS ONLY ONE MAIN ROUTE INTO THE TOWN VIA THE A376 WHICH FREQUENTLY SUFFERS LONG TAILBACKS NOW WITHOUT THOUSANDS MORE CARS BEING ADDED TO THE TOWN.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Natalie Daly

Full name: Natalie Daly

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.38

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: There is no consideration for the wider sewage system infrastructure. The current sewage system is not able to handle the already in place usage, nevermind adding more houses to the system. It is spoiling Exmouth and Budleigh Beach and Sandy Bay, leading to reduced tourism and ultimately reduced economic spend on a town which relies on tourism. Nowhere is there reference to sewage, sewage capacity and the lack of sewage infrastructure. When will this be factored into planning for new homes and people held accountable. We will end up with more instances in Exmouth where the beach has to be closed in it's busy summer periods damaging the town as it did August 2024. If building new homes was paused until the sewage infrastructure was improved, this would put pressure on south west water to invest and improve the system.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Consider the pressure on the current and not-fir-for-use sewage infrastructure and state how you will improve it to be able to handle the planned increased us.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

For the reasons above as there are issues with the sewage infrastructure which are being ignored and are ultimately decreasing the quality of the towns of those already living there. The people's voice around this issue is being ignored. South West Water need to be held accountable.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Nicola Daniel

Full name: Nicola Daniel

Organisation (where relevant): ex-chairman Otter Valley Association

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: he EDDC 2013-2031 Local Plan includes the following paragraph 18.47. I cannot understand how EDDC planners can put forward this large development in such proximity to the internationally designated Pebblebed Heath commons. Increased outdoor pursuits and domestic animals will interfere with the wildlife of the Commons and also heritage assets. Exe Estuary and Pebblebed Heaths 18.47 The Council has formed the view, after receiving advice from Natural England (the government agency responsible for the promotion of wildlife), that there is a risk that residential development (and occupants/their pet) could impact on East Devon Heaths SPA or the Exe Estuary SPA boundary. This advice is reinforced by follow-on work on Habitat Regulations assessment. A particular concern raised by Natural England is that new housing development may have an adverse effect on the SPAs; for example an increase in recreational activity and dog walking may disturb the ground-nesting birds on the Heaths or roosting or feeding birds on the Exe Estuary. Predation of birds by domestic cats is already identified as a particular concern on the East Devon Pebblebed Heaths and any increase in the number of homes could be expected to increase in cat numbers

and further exacerbate adverse impacts/predation. To help preserve the integrity of the East Devon Pebblebeds Heath, specifically on account of the impacts of domestic cats through bird predation, new dwellings will not be allowed on or within 400 metres of the Heaths Special Protection Area. This could be legally challengeable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove from the consultation

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Claire Darby

Full name: Claire Darby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

MARY DARLOW

Full name: MARY DARLOW

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reference is made to the possible relief road which “should” be made. This is not reassuring at all. The policy should insist that the relief road WILL be provided because failure to do so will cause no end of problems for the town.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Too many houses are being proposed for too small an area. Axminster does not have the infrastructure to support so many new dwellings. Before developing these sites, provision must be made for new schools, health care facilities, shops, better roads and a more reliable transport infrastructure. With these things in place, additional dwellings would be easier to subsume into the existing Axminster community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Too many houses are being proposed for too small an area. Axminster does not have the infrastructure to support so many new dwellings. Before developing these sites, provision must be made for new schools, health care facilities, shops, better roads and a more reliable transport

infrastructure. With these things in place, additional dwellings would be easier to subsume into the existing Axminster community.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As already mentioned. The existing infrastructure cannot support this many new dwellings.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

William Davey

Full name: William Davey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access of Exmo- 20 is a lot closer to Budleigh Salterton than Exmouth. The services of Budleigh, Doctors etc. could not cope. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Kirsty Davey and Matthew Davey

Full name: Kirsty Davey and Matthew Davey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We have lived in the village since 1986 and I have had connections with the village all my life. We have bought up 4 children in the village and it's so nice to have the wildlife and less traffic especially with the narrow roads. It's devastating to think that there will be more fields dug up that will impact on the wildlife to accommodate all the buildings you are suggesting to be built. Also the impact on roads with the extra traffic and large lorries that would have to come through, with all the pot holes. Also the amount of near misses from people pulling straight out from the garden centre that is there already will be more hazardous with more units there. STRATEGIC POLICY SD03 : Honiton and it's development allocations. Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be unsurmountable. If the site cannot come forward within the plan period for development then it should not be allocated.
- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village

- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation
- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network. HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:
 - The allocation clearly does not meet sustainability criteria;
 - The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
 - Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
 - Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional

employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.

- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

Laura Davey

Full name: Laura Davey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

STRATEGIC POLICY SD03 : Honiton and it's development allocations. Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be unsurmountable. If the site cannot come forward within the plan period for development then it should not be allocated.
- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation

- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;
- The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional

employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.

- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

Alan Charles Davie

Full name: Alan Charles Davie

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement, most significantly St. John In the Wilderness Grade II” listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Simon Davies

Full name: Simon Davies

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Expo_20 is significantly closer to BUDLEIGH SALTERTON than EXMOUTH, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High St, Pharmacy, Doctors, School, Beach etc) would be the preferred choice for residents of Expo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy and increase traffic congestion, in conflict with PARA 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARA 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. this is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Paul Davies

Full name: Paul Davies

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EDDC Emerging Local Plan Consultation I wish to place on record my objections as a local resident of Whimble in respect to a specific element of the EDDC Emerging Local Plan Consultation, namely policy SD29: Strategic Allocations in Whimble, and particularly to the allocation of Whim_08a (Land west of Bramley Gardens) site. My objections are on the grounds of soundness in that the allocation and policy is not based on solid evidence. It appears that the EDDC Strategic Planning Committee expressed similar objections at their meeting held on 1 October 2024 when they voted not to allocate this site. The following text is taken from the Whimble Parish Council submission and is included to add context; The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024. Professional planning officers identified and assessed the potential sites in Whimble and using their professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not. In the case of Whim_08 site, officers recommended that the site was not allocated for the following reasons: · Scale of development incompatible with spatial strategy. · Site lacks safe and convenient pedestrian access to services and facilities in the village. · The site forms part of the 'Green Wedge' between Whimble and Cranbrook. · Forms an important part of the very attractive rural landscape setting for the settlement. · Potential impact on unconfirmed wildlife site. · Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation. In the earlier phases on consultation, Planning Officers held a Public Consultation event at the Victory Hall, Whimble. This site was never considered as being appropriate for development at that event and, in fact, when local residents asked the question, the Officers in attendance vehemently denied that it was a possibility for consideration. At the meeting on 1 October 2024, Members of the committee voted to

go with the officer recommendation and not allocate the site. However, at the Strategic Planning Committee meeting on 1 November 2024 Members did a complete u turn and decided to allocate part of the site, contrary to Officer recommendation. There was no justification or reason given as to why this site was picked above any others in Whimble or other sites in the east Devon area. Also no additional work appears to have been completed by officers to assess the risks relating to this site before allocating it. This gives the appearance of the Strategic Planning Committee having a knee jerk reaction to needing to allocate additional houses across the district without considering a fully worked up proposal or sound justification (based on evidence and facts), as to why the site should be allocated (partially or otherwise). This site allocation report also considers 'If whole site is not suitable for allocation, could a smaller part be allocated?' The view of the professional planning officers was 'No'. Again, this leads Whimble Parish Council to challenge the soundness of any allocation of this site. The remainder of Whimble Parish Councils submission outlines in detail the reasoning for the unsuitability of this site and I do not wish to replicate that explanation here, however, I would wish to comment on the actions of the Strategic Planning Committee which appear to display either an unacceptable level of incompetence or a contemptuous attitude to the local community. The Nolan Principles clearly set out the standards expected of those in public life, not least elected officials in the service of their constituents. Based on the evidence presented it is apparent that the Strategic Planning Committee fully agreed with the views of the local Parish Council and their own professional Planning Officers at their 1 October meeting when this site was deemed to be unsuitable. As a local resident I, and others, were reassured that the Committee had recognised the strong evidence presented and factored this into the emerging local plan. It is unfortunate that this assurance was subsequently dissipated at the committee meeting held on 1 November 2024. The lack of any coherent rationale for the U-turn on this site by the Strategic Planning Committee within the space of a few weeks and with no apparent additional assessment to the contrary is startling, particularly in light of the disproportionate amount of development on the old A30 corridor when compared to other parts of the District (much of which has afforded no development at all in recent years, one assumes to the delight of relevant local councillors). I would contend that the behaviour of the Strategic Planning Committee in turning a blind eye to their own previous decision displays an attitude to the local community that, at best can be described as lackadaisical and an attempt to appease the requirements of National Government. The lack of honesty, transparency and accountability in failing to provide appropriate rationale to the local community could more appropriately be described as a failure to uphold the basic values of The Nolan Principles. Frankly, local residents deserve more respect. Therefore, I would like to add my objection alongside other local residents who want to see the modification of site Whim_08a being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district, where there is more appropriate infrastructure. I am also forwarding this

response to the local District Councillor in his capacity as Chair of the Strategic Planning Committee with a formal request that, as a matter of courtesy, the rationale for this decision be provided to local residents.

Simon John Davies

Full name: Simon John Davies

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Whim 08a - Land West of Bramley Gardens allocation of 50 houses is unsound.

(1) The quantity of housing exceeds the forecast local need and is disproportionate to the size of the village. (2) The site is in the green wedge between Whimble and Cranbrook. (3) the site does not have safe pedestrian access to village services, including the school. (4) Vehicle access to village services, especially the shop and the school, is on single track road, which at peak times is already choked with no free parking spaces in the village centre. (5) Vehicle access to Church Road would increase danger to pedestrians and cause further congestion in Church Road. (6) There is no bus service from Whimble Village to Exeter and the train times to Exeter are impractical for shoppers and some commuters.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Delete Whimble 08a.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Julie Davis

Full name: Julie Davis

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Jenifer Davis

Full name: Jenifer Davis

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am objecting to developers Eagle Investments (as proposed on the Site Selection Report, Site reference 20b, at the Strategic Planning Meeting on the 3rd September last) planning to build a bridge and road across a very wide section of Withycombe Brook which runs along the bottom of Southern Wood, Exmouth, in order to gain access to their proposed new site of 700 or maybe more new houses. Planning Officers need to come and to look at the width of Withycombe Brook at the bottom of Southern Wood to realise what a substantial structure would need to be erected to support a bridge for any traffic. This is unnecessary as there is already a road to the proposed site accessed from the B3178 (Budleigh Salterton road). The road running through Liverton Business Park presently ends in a roundabout, there is also a footpath offering a short walk past a children's play area to Dinan Way where there are bus stops to Exmouth town centre. I can see no advantage in causing chaos and structural upheaval to Southern Wood and continued destruction of established woodland with homes for wildlife, when it is totally unnecessary. If homeowners on the new development had access through Southern Wood, they would be no nearer present schools, shops or any infrastructure because of the disadvantage of having to navigate these minor roads with parked vehicles when easier access is already available. The established road accessed from B3178 the gives: LESS COMPLICATED ACCESS TO THE NEW SITE THROUGH THE LIVERTON BUSINESS PARK from the the Salterton Road, the B3178. This route would give potential new homeowners far easier and more direct access to Budleigh Salterton and beyond or to Exmouth town centre and sea front, rather than having to navigate through Southern Wood, then Meadow View Road, then Dinan Way to reach the Salterton Road (B3178). There are many parked cars in the vicinity of Meadow View Road, making this an

unsuitable through road for any heavy traffic. The parking issues have arisen because some landlords, who own properties in the close proximity, have let their garages out separately, leaving tenants with no off road parking. An unresolvable problem. If I were to live on the new proposed development, I would choose to use the road through Liverton Business Park, not only to have the advantage of all the commercial and retail units on my doorstep, but also because it is the most straight forward and less complicated route for Budleigh Salterton or Exmouth town centre and seafront. There would be no parked cars to have to navigate around or to block this road as all the commercial and retail units have their own free parking areas. In the 1980's, 'stop on demand buses' were tried along Meadow View Road, (I used to catch them) but this was abandoned. There is a lot more parking now than there was back then. It is so important for Planning officers to visit the area and see for themselves, not to rely on photographs as the Google photograph of Southern Wood used at the Strategic Planning Meeting on the 3rd September last by Eagle Investments. They need to see for themselves the width of Withycombe Brook at the bottom of Southern Wood and realise what a huge structure would need to be erected to span the brook and support a bridge for any traffic flow, also to look at the parking issues in Meadow View Road and see how access will be frustrating if more traffic goes back and forth from the proposed new estate through Southern Wood. TRAFFIC LIGHTS TO EXIT OR ENTER LIVERTON BUSINESS PARK are much needed now. It is presently a dangerous junction without traffic lights as some drivers take chances when trying to exit the park. Traffic lights would enable the emergency services at Liverton to act more swiftly and safely to reach any accidents or any major disasters faster, by giving them control of the traffic lights creating what I believe is called a red zone area, making us all safer. I understand this was requested at an earlier stage but has been held back. Clinton Devon Estates who own the land and rent out the units, also being one of the developers for the proposed sites, could help achieve this. I did email Clinton Devon Estates 1st July last year (2024) about the problem of queuing to leave Liverton Business Park, and the likelihood of traffic lights, before I knew of any intentions of a road being created through Southern Wood, but they did not reply. Traffic lights were eventually placed at the top of Dinan Way and at Tesco Stores on the Salterton Road to alleviate traffic problems, making the junctions safer for us all. It is inevitable that traffic lights will be necessary at some time at the junction leading in and out of Liverton Business Park. Homeowners on the new development will use this established road leading onto the B3178, rather than using minor roads like Southern Wood. The developers should provide traffic lights as part of their planning applications.

EAGLE INVESTMENTS. New housing is needed, especially social housing, and I understand the pressure councils are under to supply more housing. But the building of new homes should not be to the detriment of existing homes and families in Southern

Wood, Meadow View Road and St Johns Road, who will all suffer from noise, pollution and disruption if a road comes through Southern Wood. We are part of Exmouth too and I worry that my concerns, and those of others in this area, will not be considered as it appears Eagle Investments are so confident of their access through Southern Wood being agreed, they have already felled many trees in the woods across from Withycombe Brook at the bottom of Southern Wood. You can now see through the woods; the denseness has been depleted. Trees are important, not only in helping flood management. Eagle Investments started felling trees at the bottom of Southern Wood in 2023 and when asked by neighbours the reason, they were told it was due to Ash dieback. I understand Eagle Investments obtained a licence from the Forestry Commission, application Ref: 018/2753/2022, a licence with permission "to fell trees for silvicultural thinning to improve the quality and vigour of the remaining trees and that any planning permission sought after would not override any conditions of the licence". Eagle Investments workers have felled many trees conveniently located in the path of their new proposed road at the bottom of Southern Wood, this was before any planning permission had been sought or granted. If they are given permission for road access through Southern Wood, they will have to remove any remaining trees to enable the erection a very substantial structure to support a bridge and road over Withycombe Brook, therefore disregarding any conditions of their licence from the Forestry Commission "to fell trees for silvicultural thinning to improve the quality and vigour of the remaining trees and that any planning permission sought after would not override any conditions of the licence". SOUTHERN WOOD is presently a quiet cul de sac with 12 houses, all situated close to the road so a higher flow of traffic will cause air pollution issues. The road is approximately 6.2 m at its widest point, with raised curbs and paths both sides. The road slopes downwards towards the woodland and Withycombe Brook so is on a hill. Every house from the top of Southern Wood falls lower than its neighbour. As an example, our house, 8 Southern Wood (second from the bottom) is approximately 1 metre lower than our neighbour, 7 Southern Wood. The houses at the bottom of Southern Wood, 5 and 6, both nearest Withycombe Brook, I understand are level 3 flood zone. The brook does gush after heavy rainfall and can be heard. I now have slight flooding down the side of my house and puddling in my garden after heavy rainfall which is a new occurrence and will be made worse with 700 or more new houses set higher than Southern Wood causing a risk of flooding. At present in Southern Wood, we enjoy a wide variety of birds, such as cuckoos, magpies, black birds, robins, sparrows, sparrow hawks, pigeons, buzzards, crows, red wings, long tailed tits, the list goes on. I have seen badgers and foxes in my garden. There are wildflowers in the woods in spring including bluebells and primroses which also appear in my garden. I have the last remaining field hedge at the bottom of my garden from when it was Veiges Farm. Crows used to nest in the trees at the bottom of Southern Wood and fly around in circles above before roosting, but they have mysteriously moved on. Some crows still visit the road but no longer roost there. It will be a shame if an unnecessary road will change the

environment we presently enjoy. I would refer to the red line drawn on Exmouth 20b, where Eagle Investments have shown access not from Southern Wood, but from behind Southern Wood, from Woodfield Close, an area with garages and parking for the residents there. This is confusing and should be corrected.

Mary Davis

Full name: Mary Davis

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

I live at no. 39 Slewton Crescent, Whimble and strongly object to the proposed development at Whimble_11 for all the reasons cited in the parish council's response including drainage/flooding issues, unsuitable road access leading to increased traffic through the village and the need to preserve natural habitat. The land is also of local importance as it is the Richard Whiteway Memorial Ground and the intention was that the land should not be built on and can only be used for recreational activities.

Jonathan Dawson

Full name: Jonathan Dawson

Other party name (if relevant): Anne Dawson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would cause major detriment to heritage assets such as St John in the Wilderness church- contrary to policy HE02 It conflicts with the Strategic Nature Area 368, causing the loss of irreplaceable habitats, ancient hedgerows and trees (contrary to Local Plan para 13.9), and fragmenting habitats and eliminating wildlife corridors (contrary to para 13.23). It is also in conflict with Policy OL10 and Policy PB04. Extensive construction on this site with heavy clay soil and ineffective soakaways would exacerbate the flood risk of Withycombe Brook downstream through Exmouth which is exceeding its design capacity - in conflict with Policy AR01B The distance of this development from Exmouth makes Budleigh Salterton the nearest town with medical facilities, shops, and schools. This would undermine the settlement hierarchy and lead to the coalescence of Exmouth and Budleigh contrary to Policy OL05. Inevitably, with so many houses with limited (if any) public transport access, there would be a very substantial increase in private vehicles on the road towards Budleigh. The roads would be too steep and the distance too far from a town centre to use other forms of travel eg cycle or foot. This is contrary to policy TR01. Another site should be found for any additionally required houses, which was appropriate and available. Exmo 20 is contrary to policy PB01 and not in accordance with the mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Please remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Paul De'Athe

Full name: Paul De'Athe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to EXMO_20 for housing allocation needs to be found (if any) and one which is agreed to be suitable, available and possible under the HELAA guidelines, Stage 1 of which requires the participation of local communities, amongst other groups. Any development such as EXMO_20 would be prejudicial to the local natural environment such as Bystock Pools and adjacent Pebblebed Heaths managed by the Pebblebed Heaths Conservation Trust (PHCT) supported by Clinton Devon Estates. These are recognised as Sites of Special Scientific Interest (SSSI). The National Nature Reserve (NNR) includes Bystock, Dalditch and East Budleigh. Special Areas of Conservation (SAC) set up prior to Brexit and still in force include Special Protection Areas (SPA) for rare or migratory locally birds such as Nightjars, Dartford Warblers, Curlews and Stonechats, all of whom are to be found on the heaths known locally generically as 'Woodbury Common'. Whilst no physical development can take place within 400 metres of the heaths, an adjacent local development of some 700 dwellings would give rise to a human population of potentially 1400+(?) people with accompanying dogs and cats posing a threat to the indigenous wildlife species on their doorstep. From April 1st-July 31st interference with nesting birds is prohibited, and ground nesting birds in particular are vulnerable to dogs of their leads on the heaths. The potential noise and pollution (av. 68gms per km of an average petrol/diesel vehicle) entering and exiting the projected estate onto the wholly unsuitable B3179 at all hours of the day would provide further intrusion into this vitally important area. Do we really need this in such a unique corner of not only East Devon but of the nation as a whole? We all have a duty to ensure the biodiversity and integrity of our unique local environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order that all points of view are equally represented in the interests of transparency in the planning process

Full name: Paul De'Athe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites defined as Sites of Special Scientific Interest (SSSI), a National Nature Reserve (NNR) incorporating national and internationally unique habitats such as the Pebblebed Heaths, as well as other physical heritage assets such as St John in the Wilderness church and churchyard a currently unique and attractive rural setting for worship and burials.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a local resident with an interest in the history, geography and ecology of this unique nationally important area

Full name: Paul De'Athe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

An alternative site to EXMO_20 for housing allocation needs to be found (if any) and one which is agreed to be suitable, available and possible under the HELAA guidelines, Stage 1 of which requires the participation of local communities, amongst other groups. Any development such as EXMO_20 would be prejudicial to the local natural environment such as Bystock Pools and adjacent Pebblebed Heaths managed by the Pebblebed Heaths Conservation Trust (PHCT) supported by Clinton Devon Estates. These are recognised as Sites of Special Scientific Interest (SSSI). The National Nature Reserve (NNR) includes Bystock, Dalditch and East Budleigh. Special Areas of Conservation (SAC) set up prior to Brexit and still in force include Special Protection Areas (SPA) for rare or migratory locally birds such as Nightjars, Dartford Warblers, Curlews and Stonechats, all of whom are to be found on the heaths known locally generically as 'Woodbury Common'. Whilst no physical development can take place within 400 metres of the heaths, an adjacent local development of some 700 dwellings would give rise to a human population of potentially 1400+(?) people with accompanying dogs and cats posing a threat to the indigenous wildlife species on their doorstep. From April 1st-July 31st interference with nesting birds is prohibited, and ground nesting birds in particular are vulnerable to dogs of their leads on the heaths. The potential noise and pollution (av. 68gms per km of an average petrol/diesel vehicle) entering and exiting the projected estate onto the wholly unsuitable B3179 at all hours of the day would provide further intrusion into this vitally important area. Do we really need this in such a unique corner of not only East Devon but of the nation as a whole? We all have a duty to ensure the biodiversity and integrity of our unique local environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order that all points of view are equally represented in the interests of transparency in the planning process

Full name: Paul De'Athe

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The location of the access point of Exmo_20 is that that it will make the site significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) will most likely to be the preferred choice for residents of Exmo_20. This is conflict with the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

Avril Denton

Full name: Avril Denton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Amanda Denton

Full name: Amanda Denton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live at no 32 Slewton Crescent and strongly object to the proposed development at Whimple_11 for the reasons cited in the parish councils response including drainage/ flooding issues, unsuitable road access leading to increased traffic through the village and the need to preserve a natural habitat. I believe the Richard Whiteway Memorial Ground land is also deemed land of local importance and should not be built on as deemed by EDDC planning officer.

Ian Deverell

Full name: Ian Deverell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Carolyn Deverell

Full name: Carolyn Deverell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Edna Devetta

Full name: Edna Devetta

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am objecting the Exmo_20 because of the lack of infrastructure and the impact it will have on the Local community, ie schools, doctor's surgurys (both of which are at capacity) and the sewage system which already cannot cope. This goes against POLICY OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Brian Devine

Full name: Brian Devine

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Mandy Dickinson

Full name: Mandy Dickinson

Proposal:

5. Development in the Towns and Villages

Helen Dimond

Full name: Helen Dimond

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Places have not been placed in the correct tier of the settlement hierarchy. Lympstone is a village and should be in Tier 4. It has limited facilities ,a single shop, no proper playing fields and a school which has temporary classrooms and uses the village hall during the day so that it is not available for other community facilities on weekdays Paper GEV-001, Role and Function of settlements ,recognises that Lympstone should be in a lower tier to towns such as Budleigh Salterton yet they have been placed in the same tier, tier 3 The only reason for Lympstone's inclusion in Tier 3 seems to be that it has a railway station . This has only 13 parking spaces . The sites proposed for new dwellings are on the edge of the village and from which few residents will walk or cycle to the station

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Place Lympstone in Tier 4 as a service village

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : I wish to make sure that I have done the most I can to ensure the level of future development is appropriate for Lypstone.

Full name: Helen Dimond

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP03

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Lymptstone was the first village in East Devon to have a Neighbourhood Plan made which allocated sites for 40 dwellings in accordance with the current Local Plan . The village has some 900 households and this was a reasonable level of new development for the village to accommodate . it now seems that the neighbourhood area needs 323 , a massive increase of over a third . This compares with Budleigh Salterton a much larger settlement with appears to need only 132 . There are similar extreme variations in the level of housing need identified for other places . A more equable distribution of housing is needed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There needs to be a fairer distribution of housing better related to the nature of places . This relates back to my comments on SP01

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : I want to ensure that I have done as much as I can to ensure Lymptstone has an appropriate level of development.

Full name: Helen Dimond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Two on the allocation sites for Exmouth are in Lympstone Parish . While Lymp14 is an extension of the Goodmores Farm development and will look towards Exmouth , the other Lymp07 will clearly look towards Lympstone . Residents on both sides of Courtlands Lane identify with Lympstone not Exmouth. The former Courtlands House (which is in Exmouth Parish) chose to rename itself Lympstone Manor. Following a public inquiry a planning inspector concluded that this site was not a suitable one for housing . With the completion of the Dinan Way extension the development of this site seems inevitable but it should be recognised that it will add to the pressure on Lympstone . The site should therefore be included as an allocation for Lympstone as part of the 323 houses that are deemed to be necessary according to policy SD03

While a previous planning inspector following a public inquiry concluded that this site is .

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Transfer Site Lymp 07 to an allocation for Lympstone rather than Exmouth

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to make sure I have done all I can to ensure that Lympstone has an appropriate level of development

Full name: Helen Dimond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Insufficient land allocated for housing (see comments for SD10)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Allocate more land for housing

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As for all my other comments

Full name: Helen Dimond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Gross under provision of housing for a town the size of Budleigh and not according with the spatial strategy (See comments for SD10) . As the inspector said in the report on the current Local Plan Budleigh 'risks becoming the preserve of affluent retirees which cannot be healthy or sustainable '

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Allocate more land for housing

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As before and fed up with filling this in!

Full name: Helen Dimond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are 3 sites allocated ,including one in Woodbury Parish (GH/ED/72a) on which Lymptstone Parish Council was barred from making representations at the Strategic Planning Committee of East Devon District Council when this allocation was considered. The site is on rising ground on the approach to the village, in the Coastal Preservation Area and adjacent to the listed Nutwell Park. The three sites add up to 92 houses which together with the site at Courtlands Cross give a total of 192 houses . This far exceeds the stated aim of Policy SP01 of development for Local Centres 'that meets local needs and those in the immediate surroundings.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Omit site GH/ED/72a from the allocations

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Helen Dimond

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are three sites allocated including one in Woodbury Parish (GH/ED/72a) on which the Parish Council was barred from making any representations. The three sites add up to 92 houses which together with the site at Courtlands Cross give a total of 192 houses . This far exceeds the stated aim of Policy SP01 for development for Local Centres 'that meets local needs and those of the immediate surroundings) Sidmouth a Main Centre has site allocations for 157 dwellings and Budleigh Salterton only 35(this was increased from an original estimate of 25 for the site) These allocations are both less than for the village of Lymstone . The allocations are not in accord with the Spatial Strategy . The inspectors report on the current Local Plan relating to Sidmouth,Seaton and Budleigh stated that 'The Plan's strategy risks (such) coastal towns becoming the preserve of affluent residents which cannot be healthy or sustainable. This is even more the case in this plan. This relates back to my comments for SP01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Omit site GH/ED/72a and find additional sites in Sidmouth and particularly Budleigh Salterton

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to make sure I do as much as I can to ensure an appropriate level of development for Lympstone

Full name: Helen Dimond

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN06

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The policy regarding replacement dwellings should apply across the whole plan area rather than only outside settlements as appears from the heading . It would be helpful to indicate when such a replacement is justified . There are many cases in Lymington where a perfectly sound building has been replaced simply because the owner wants a bigger, modern dwelling when the existing could be perfectly adapted . This particularly applies to the replacement of bungalows with large houses.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Omit outside settlement boundaries from the heading to make clear that the policy applies everywhere

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Rebecca Disbury

Full name: Rebecca Disbury

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development at Exmo20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo20 is contrary to policy Pb01 of the local plan and not in accordance with the mitigation strategy.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Stephen Disney

Full name: Stephen Disney

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: I wish to object to the Gypsy site at the former pig farm at the border of Tithebarn and Pinhoe, based on the health implications and well-being of the potential people living there.

The site is right under the M5 motorway. Caravans are not the most noise insulated homes and the noise pollution will not be good to the Gypsy's mental health. The air and tyre pollution that will be spilling of the motorway down into the site will also not be good for their physical health.

I worry that the site is really not going to be good to the resident's health.

Tom Dixon

Full name: Tom Dixon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. (POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings).

Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street,

Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. (POLICY OL05: This policy stated that development will not be permitted if it could lead to or encourage settlement coalescence).

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach as the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. (POLICY AR01(B) states that development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere).

The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage

(HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Tom Dixon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policies PB01, PB04, OL09, OL01 and paragraphs 2.10, 13.23 and 13.9 of the Local Plan. ALLOCATION OF Exmo_20 is in conflict with policy PB01 and not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA). (Policy PB01 states that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless they cannot be located on alternative sites that would cause less or no harm). ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send traffic along the boundary of the Pebblebed Heath. (Policy OL09 states that “permission will not be granted for development which would result in pollution that cannot be adequately mitigated”). ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out advert effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).” (POLICYPB04 states that proposed plans must not affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 (including SAC/SPA)). ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI. (PARAGRAPH 2.10. Objective 8. This states the objective “To protect and enhance our outstanding natural environment and support an increase in biodiversity”).

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. (PARAGRAPH 13.23. The Local plan states that East Devon has diverse but fragmented habitats and aims to enhance biodiversity increasing habitat areas and connecting isolated habitats). ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long-established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. (PARAGRAPH 13.9 aims to protect irreplaceable habitats and important features such as ancient woodlands, veteran trees, and species rich hedgerows from destruction and degradation).

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade

It* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left. (POLICY OL01 states that development will only be permitted where it would not harm the aesthetic and perceptual factors such as “tranquillity, wildness and dark skies”).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Tom Dixon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location. (POLICY SP01 proposes to promote the most significant levels of development at the principal centre of Exmouth). ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6. It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements. (PARAGRAPH 11.6 proposes that it is feasible for larger developments to be within 800m of key services and facilities. (Studies cited in the Local Plan show that people prefer to walk if their journey is not further than 800m/10 minutes walking each way)). ALLOCATION OF Exmo_20 is in conflict with policy TR01. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local

topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion. (POLICY TR01 proposes that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development).

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of

0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles. (Paragraph 11.2 promotes focussing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion). ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or dentist - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has. (PARAGRAPH 3.34 states that by directing growth to the tier 1-4 settlements their approach ensures development is concentrated in areas with existing infrastructure and services). ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no access to Dinan Way and the

A376, the significant amounts of vehicle movements from this site will be on rural B roads, locally notorious for being congested and substandard. (POLICY TR03 states that where development is likely to generate significant amounts of vehicle movements planning permission will not be granted unless they can identify measures to secure new sustainable travel arrangements, taking into account (amongst other things) the scale of development and the availability of public transport, and walking and cycling opportunities).

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6; Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon. (PARAGRAPH 2.6 states that "Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mark Alexander Dodd

Full name: Mark Alexander Dodd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 should be located where it would not harm Pebblebed Heaths (SAC/SPA) It is contrary to POLICY PB01. Exmo_20 would destroy tranquillity wilderness and dark skies of the countryside contrary to POLICY 0L1 Exmo_20 would fragment and isolate local habitats and destroy wildlife corridors Contrary to PARAGRAPH 13.23. It would also be detrimental to irreplaceable habitats. veteran trees and species rich hedgerows contrary to PARAGRAPH 13.9 Evidence relating to air quality for contrary to EXMO_20 are absent. POLICY 0L09 & PB04 Due to soil type and position it will exacerbate flood risk and lead to more frequent sewerage discharges. Conflict with POLICY AR01B and others.

EXMO_20 will increase car travel in conflict with PARAGRAPH 11.2. It is siloed and people would need to travel much further than 800m to existing services contrary to PARAGRAPH 11.6. Too far and too steep for walking or Cycling to any town center. The main access is closer to Budleigh Salterton than Exmouth which will result in many people more using services and infrastructure of Budleigh High street, schools, doctors, beach. This would lead to the coalescence of Budleigh and Exmouth contrary to POLICY 0L05 of the local plan and be highly detrimental to the unique character of Budleigh Salterton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access EXMO_20 from the B1379 and reduce the size significantly making it nearer to Exmouth with an area of wild water absorption for run-off.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Eileen Doherty

Full name: Eileen Doherty

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am a resident in Exmouth. I strongly oppose this development, Exmo_17. This is a stunning piece of land which should be protected! I am a cyclist, and I would be very unhappy about the proposed access road, which would cut across the old railway line, a much used walking and cycling route.

Surely the land on the opposite side of the Salterton Road, near the existing business park, would be more suitable, being as we are all aware of the need for housing, especially affordable housing.

Aidan & Jayne Doherty

Full name: Aidan & Jayne Doherty

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Objecting to EDDC Emerging Local Plan: Whim_08a

We strongly disagree and fully object to policy SD29: Strategic Allocations in Whimble, particularly to the allocation of Whim_08a (land west of Bramley Gardens) site in the EDDC Emerging Local Plan. The objection is on the grounds of soundness in that the allocation and policy is not based on solid evidence.

The EDDC Strategic Planning Committee initially rejected the site on October 1st 2024 following professional planning officers' advice that it was unsuitable due to: incompatibility with the spatial strategy, lack of safe pedestrian access, Green Wedge status separating Whimble and Cranbrook, impact on rural landscape & wildlife and flood risk requiring further assessment. Despite this on November 1st 2024, the committee reversed its decision, without justification and against the original evidence. No additional assessments were carried out to support the allocation raising serious concerns about the decision.

Whim_08 forms part of the 'Green Wedge' between Whimble and Cranbrook

We challenge the soundness of the proposed allocation due to the Green Wedge. Allocation of this site would potentially damage the individual character and identity of Whimble. This site forms an important part of the very attractive rural landscape setting for the settlement of Whimble. The EDDC Emerging Local Plan Policy OL05: Green Wedges states 'Within green wedges, as defined on the policies map, development will not be permitted if it would add to existing sporadic or isolated development, damage

the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.’

This would also lead to settlement coalescence between Whimble and Cranbrook, which is a material planning issue, and clearly demonstrates that this site should not be allocated in the Local Plan. This was the view of the EDDC professional Planning Officers as stated in their report 1st October 2024.

Scale of development incompatible with spatial strategy

The Strategic Planning Committee have already approved the Cobdens area of Cranbrook part of which is within the Whimble Parish boundary to build 1500 houses, a school and a traveller site. These sites will have a far better infrastructure than Whimble Village so why has the additional housing requirement not been allocated at these sites.

The EDDC Site Allocation Report for Whimble states Whimble is a 'Tier 4' settlement, where the draft local plan seeks to promote limited development to meet local needs. The original proposed development of up to 180 dwellings on Whim_08 is excessively high in relation to the scale of the existing village. This would suggest that an additional 396 people based on 2.2 people per household are going to be added to the current Whimble parish population of circa 1900. That's an increase of 24% which is a ridiculous amount of expected growth for a village and incompatible with spatial strategy. Policy SP01: Spatial Strategy section E states 'Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.'

The total allocation of 83 homes in Whimble is not a 'limited development' (Whim_11 total 33 homes; Whim_08a total 50 homes), especially when the Whimble Housing Needs Report lists a significantly lower figure. This also represents 183 more people in the village (working on 2.2 people per household) or another 9.6% increase in the number of people living in this village. When working on the Whimble Neighbourhood Plan, the Parish Council commissioned a Housing Needs Survey and the results in the report states 'a need for at least 4 affordable homes within the next 5 years.' The housing allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01:

Housing to address needs, which states ‘this will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.’

Site lacks safe and convenient pedestrian access to services and facilities in the village

Church Road is the main route into the Village and is a narrow and dangerous road. Access to the site and potential development would be through Bramley Gardens and onto Church Road. The section of Church Road nearest to the Square and village shop is single track road with houses either side of the road. There is no pavement along the stretch of Church Road to The Square and School Hill nor is there room for a pavement. The villagers and Parish Council have raised concerns about the volume and speed of traffic on that road.

I was a parish council meeting recently and they are so concerned about the volume and speed of traffic along Church Road that they have created a Community Speed Watch Group to monitor the traffic and speed along Church Road. The issue was raised as to why the Speed Watch Group had not undertaken any monitoring to date with speed guns along this route and the answer was because the police have stated it ‘was too dangerous in terms of where to record the speed of traffic and traffic monitors safety was at high risk!

To access the village shop in the Square and Whimble primary School in School Hill we have to walk down Church Road which has no pavements. There is no safe and convenient pedestrian access to services and facilities in the village. To ensure safety most people will use their car or vehicle to access the village shop or primary school. This is not sustainable and surely would be against EDDC Emerging Local Plan Policy TR01: prioritising walking, wheeling, cycling and public transport and is also contrary to the EDDC Climate Change aspirations.

Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation

Part of is at risk of flooding and does flood as we have witnessed over the 14 years we have lived here. A full survey would be required to understand the nature and extent of the risk before consideration could be given to any allocation. Our understanding is that planning officers have not carried out further work relating to the flood risk before consideration was given to a partial allocation. There is no sound evidence for allocating this site in the EDDC Emerging Local Plan and it is contrary to Policy AR01: Flooding.

Potential impact on unconfirmed wildlife site

There is an abundance of wildlife and development of this site would be contrary to EDDC Emerging Local Plan Policy PB03: protection of irreplaceable habitats and important features. As a local resident with our property backing onto Whim_08, I can confirm there is a huge amount of wildlife which is home to little owls, great spotted woodpeckers, badgers, deer, crows, green finches, bats, badgers, hedgehogs and more.

A public consultation was held in Whimble by the planning officers in the very early phases of the strategic plan consultation. Whim_08 was never considered as being appropriate for development at that event and when local residents asked the question like us, the planning officers in attendance vehemently denied that it was a possibility for consideration, nor should it be considered.

At the meeting on 1 October 2024, Members of the committee voted to go with the officer recommendation and not allocate the site. However, at the Strategic Planning Committee meeting on 1 November 2024 Members did a complete u turn and decided to allocate part of the site, contrary to Officer recommendation.

There was no justification or reason given as to why this site was picked above any others in Whimble or other sites in the east Devon area. Also no additional work appears to have been completed by officers to assess the risks relating to this site before allocating it. It looks like the Strategic Planning Committee have panicked and they need to allocate additional houses across the district without considering a fully worked up proposal or sound justification based on evidence and facts, as to why the site should be allocated, partially allocated or otherwise.

This site allocation report also considers ‘If whole site is not suitable for allocation, could a smaller part be allocated?’ The view of the professional planning officers was ‘no’. We challenge the soundness of any allocation of this site, full or partial.

We are totally against the proposed size and location of the development. It is the view of the Parish Council and us that development would be better placed elsewhere in Whimble or in Cranbrook or elsewhere in the district where there is appropriate infrastructure. This is also our view as we have very poor infrastructure within Whimble. There is no sound justification as to why the Strategic Planning Committee decided to go against the professional judgement of the Planning Officers and allocated this site in the Emerging Local Plan. Also, in terms of soundness, the Strategic Planning Committee does not appear to have fully considered a number of other options that could have been chosen.

Whimble Parish Council is looking at site allocations as part of the evidence base for its Neighbourhood Plan. A number of sites have been put forward which are:

Whim_03 Land to the south of Grove Road Whim_07 Land south of Broadclyst Road
Whim_13 Land north side of Grove Road Whim_18 Land to the east of Church Road
Whim_20 Land to the north of Plumtree Lane

The Parish Council’s preference would be that a site is allocated to the east of Church Road (Whim_18) so that it is nearer to the established infrastructure near Hand and Pen. It is appreciated that there are constraints to these sites but the Parish Council challenges and us as residents also challenge there are constraints with site Whim_08a, hence why the EDDC professional Planning Officers recommended that the site was not allocated.

Whimble Parish Council believes that Policy SD29: Strategic Allocations for Whimble, specifically site Whim_08a is not sound, as the decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made to partially allocate the site. Therefore, Whimble Parish Council and local residents want to see the modification of site Whim_08a being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district (and outside of Whimble Village which is a Tier 4 settlement) where there is appropriate infrastructure.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We do not believe that the EDDC Emerging Local Plan policy SD29: Strategic Allocations in Whimple is sound, and therefore site Whim_08a should not be allocated.

Philip and Rebecca Dominy

Full name: Philip and Rebecca Dominy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live at 35 Slewton Cr, Whimble and object to the proposed development at Whimble_11, for all the reasons cited in the parish council's response. These include drainage/flooding issues, unsuitable road access, increased traffic through the village (already a safety hazard at peak times with school buses trying to get through the narrow road through centre of the village and children walking to school), plus the need to preserve the DEFRA 'priority habitat (woodland and orchard)' and several protected trees, notably the one in the middle of the land. Furthermore, 33 houses on this small site is too many. It was considered unsuitable for development in the past, so what has changed?

Rebecca Dominy

Full name: Rebecca Dominy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to object to the proposed development at Whimple_11. I live in Slewton Crescent, Whimple, adjacent to this land. It is my understanding that the land was deemed 'Land of local importance' and therefore should not be built on for housing but only used for activities which retain its open nature. I understand that it is also classed as priority habitat (woodland and orchard) and therefore contrary to EDDC Emerging Local Plan Policies PB02. In addition to this, building 33 houses on this land is too many for the space, and would increase traffic in the very narrow lanes nearby, especially through the centre of the village which is already a log-jam at peak times and a safety hazard for the children walking to the primary school. I understand there are protected trees on the land, in particular the tree in the middle of the land. Part of the land is subject to flooding and further development would risk flooding further downstream, which is already an issue.

Elizabeth Mary Donnelly

Full name: Elizabeth Mary Donnelly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/ SPA). Developing Exmo _20 is contrary to Policy PB01 of the local plan and not in accordance with with the mitigation strategy. The main access point of Exmo _20 is much closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (high Street, Medical Center, local school, beach etc) would be the obvious choice for residents of Exmo-20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan. Consider more appropriate development on brownfield sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Elizabeth Mary Donnelly

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Elizabeth Doorbar

Full name: Elizabeth Doorbar

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access road into Exmo_20 is significantly closer to Budleigh Salterton than to Exmouth, which will put pressure on the infrastructure of Budleigh (the high street, doctors surgery, school etc0). This would lead to coalescence of Budleigh and Exmouth, which is contrary to POLICY OL05 of the Local Plan. An alternative site should be found, which will not cause damage to the National Landscape. The development would also exacerbate the risk of flooding along Withycombe Brook through Exmouth.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Kaymie Dowling

Full name: Kaymie Dowling

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and

POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to

POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways

ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY

AR01B. ? Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key

services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is

contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to

coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. lol

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Michael Downes

Full name: Michael Downes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Anthea Downes

Full name: Anthea Downes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. ? The Habitats Regulations assesment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor’s, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

There is no way that the plan to join the land proposed to access the road opposite the Archery Club could cope with the significant amount of traffic which would be generated. The existing infrastructure already struggles with sewerage, water supply, flooding etc. The impact on Woodbury Common would be significant. The buyers of these houses would need transport and if each house has at least one car this is contrary to all environmental objectives. Remove Exmo_20 from Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Michael Downes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: *

The development proposed at Exmo_20 needs to be located on an alternative site where it would cause no harm to the Pebblebed Heaths(SAC/SPA). Exmo_20 is contrary to POLICY PB01 of the local plan and I do not believe it is in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. * The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would

be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan and revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Emma Downs

Full name: Emma Downs

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Whim_08 site is on a scale of development incompatible with spatial strategy. The decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made . Furthermore, the site lacks safe and convenient pedestrian access to services and facilities in the village. The site also forms part of the 'Green Wedge' between Whimble and Cranbrook. This land forms an important part of the very attractive rural landscape setting for the settlement. It is also highly likely to have a negative impact on wildlife. Of great concern is the risk of flooding, and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As the decision to allocate Whim_08 went against the solid evidence provided by the professional Planning Officers report and recommendations I don't think modifications can make this part of the development sound.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Alan Drake

Full name: Alan Drake

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: These development areas were investigated as part of the 'Neighbourhood Plan' And were overwhelmingly rejected.

This development will destroy the habitat for the protected Great Crested Newt population of the pond at the centre of the site.

This development will destroy yet more 'Grade 1' agricultural land, reducing the countries food security.

Developing this elevated, flood prone site, will cause flooding and problems in the surrounding lower lying population areas.

This development will be directly in-front of the historic Grade 2 listed 'Lake House'. Views of and from this important village landmark, will be obscured by development on the proposed site due to its elevation with respect to Lake House.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification

will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Prioritise development on 'Brown Field' sites NOT Grade 1 Agricultural land.

Protect the Great Crested Newt population by NOT building near it.

Do not develop flood prone sites as developments of this type cause flooding issues in other areas not previously affected. This site has a VERY high winter water table.

Any developments should not have a detrimental effect on the existing historic character of the village.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The Broadclyst population have been asked to comment / provide feedback over and over again regarding this unwanted large scale development.

The entire consultation has been designed to put off people from commenting by ignoring all their previous comments and asking them to provide feedback time and time again.

All the comments from the MANY previous consultations MUST be looked at and included in this and any future requests for 'feedback' on this proposal.

The 'Legal' type wording of this feedback form is again designed to be off-putting to the majority of the residents of Broadclyst. This results in a skewed view of residents true opinions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Lisa Drakelaw

Full name: Lisa Drakelaw

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

...Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

...Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

...The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality(East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

...Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE 02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

...Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

...The main access point to Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. Red

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo 20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Karen Drodge

Full name: Karen Drodge

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Kate Duggan

Full name: Kate Duggan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I'm not a lawyer so it's difficult to say, but it feels like local people's wishes are being completely ignored. Surely the point of a consultation is to actually listen and act on what you're told? A petition signed by 500 residents of Feniton and Payhembury wasn't even passed to East Devon District Council. The Common Place system makes it difficult for local citizens to have a say.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There needs to be an easier way for people to respond to the consultation. So many people don't even know about the plans as they don't seem to have been well publicised. If you're not on social media, you wouldn't know there's anything even happening.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proportion of new land set aside for homes and business use in Feniton and Payhembury is ludicrous.

When it comes to Payhembury, the plans seem to have completely missed the fact that 10 new homes are already in the process of being built in this tiny village and several

have been built over recent years. We've done our part! The village is already growing by around 10%. The school is oversubscribed. The secondary school is oversubscribed. The roads are narrow. There isn't enough parking, so cars regularly block the roads. Fields flood. Roads flood to the point where they're often impassable. Many of the roads don't have footpaths next to them so it's already dangerous for people walking without adding extra traffic to the mix.

The plans for Feniton are horrific. Mass building that would completely destroy the surrounding landscape and the very feel of the village. This isn't a city suburb, it's a rural village. If people want to live in a town or suburb, they move to them.

There also just isn't the infrastructure. Feniton floods every single year. Raw sewage leaks into gardens and roads. The flood alleviation scheme underway is only designed to support the existing number of homes and won't solve the issue of the roads flooding. The school is oversubscribed. The secondary school is oversubscribed. (Lots of children are unable to get into King's anymore, despite being in the catchment.) The local GPs are oversubscribed. The roads are very narrow, unlit and there are few passing places. There would be absolute chaos with more people driving in and out every day.

The land set aside in both Payhembury and Feniton is prime agricultural land. The world is extremely unstable right now. There is every chance we are going to need the ability to grow more of our own food here in the UK. (We currently produce less than half of what our population needs to survive.) The focus should be on brownfield sites before building on our fields.

There also just isn't the local need or demand for these new homes, as shown by the Devon Communities Together survey. The Local Plan is presumably to alleviate pressure on other areas, but that shouldn't be to the detriment of people who already live here.

The plan seems determined to destroy everything that is special about living in a rural area. Meanwhile, former office buildings and shops around Exeter are lying empty or only partially used. These could be turned into homes.

Please, please, please, consider the actual evidence, the local viewpoints and the reality and reconsider the Local Plan. Visit Payhembury and Feniton when they're battling with flooding. Talk to people.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Realign the Local Plan with the vision and strategy and local demand, by significantly reducing the number of homes planned for rural areas such as Feniton and Payhembury. Focus on brownfield sites and bringing empty buildings back into use. Protect village life and agricultural fields.

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: N/A. I don't have any information on this.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: N/A. I don't have any information on this.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Michael Trevor Dunn

Full name: Michael Trevor Dunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment

area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying

land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key

services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is

contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jill dupain

Full name: Jill dupain

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
exmo_20 will destroy the wildness of the countryside and would be detrimental to the irreplaceable habitats

Brenda Duplock

Full name: Brenda Duplock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Wu

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Why is it so difficult to make objections to this plan?

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Why is it so difficult to make objections to this plan?

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

Full name: Brenda Duplock

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Wu

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Why is it so difficult to make objections to this plan?

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Why is it so difficult to make objections to this plan?

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Not a lawyer but I don't see why any of these developments are necessary and cannot see how the local infrastructure can be expected to cope with this proposed level of development - it is already failing to support current residents.

Pauline Dyer

Full name: Pauline Dyer

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, therefore making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, School, beach etc;) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade 11* listed church and churchyard, and drastically altering the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality’ (East Devon Pebblebed Heaths SAC/SPA) such that the plan fails the integrity test.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk areas along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jeremy & Sarah Eaki

Full name: Jeremy & Sarah Eaki

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/ Medieval settlement, most significantly St John in the Wilderness Grade II* listed church, eroding the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

?Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TRO1.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20B as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Alison Earp

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable at site sifting stage (HELAA stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stage 2). It has never been either 'preferred' or '2nd choice' therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the Strategic Planning Committee despite the assessment not being complete.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been selected as either 'preferred' or '2nd choice' therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated' and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). POLICY AR01(B) states that 'development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere'. The site sits upstream of Exmouth, on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. PARAGRAPH 3.30 states that settlement boundaries define where development is acceptable. The settlement boundary of Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths. This then defines this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary it is available for other kinds of development. This is contradictory to the precautionary approach, the plan fails to robustly protect against adverse effects of recreational use etc on the Pebblebed Heaths.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy OL05. POLICY OL05 states that development will not be permitted if it could lead to or encourage settlement coalescence. The main access point to Exmo_20 is 4 miles from the center of Exmouth and only 2.2 miles from the centre of Budleigh Salterton. This is likely to make Budleigh significantly more accessible to the development. The access arrangement for the site leads naturally down the road into Budleigh Salterton High Street whereas to get into Exmouth means travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, primary school, beach etc in Budleigh would be the most accessible and obvious choices for residents of Exmo_20. Currently Exmouth and Budleigh are separated in terms of functionality but this development would merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02. POLICY HE02 states that proposals for development will be expected to be sympathetic to listed buildings and their settings. A development the size of Exmo_20 and its proposed 700 houses, the size of a substantial village, surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the remote and tranquil surroundings of the church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. POLICY OL01 states that development will only be permitted where it would not harm the aesthetic and perceptual factors such as “tranquillity, wildness and dark skies” The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the housing development itself, the main site access point being at the B3179, directly opposite the SPA/SAC/SSSI would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a ‘wilderness’ setting integral to the grade II* listed church which would be harmed by having a housing development encircling it. A buffer zone is unlikely to mitigate the reach of artificial light from a development this size.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. PARAGRAPH 13.9 states the objective is to protect irreplaceable habitats and important features such as ancient woodlands, veteran trees, and species rich hedgerows from destruction and degradation. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Development of Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation. These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Exmo_20 also contains many long established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and although space can be left around them, degradation and fragmentation of habitat is unavoidable. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.23. PARAGRAPH 13.23 of the Local plan states that East Devon has diverse but fragmented habitats and aims to enhance biodiversity increasing habitat areas and connecting isolated habitats. Exmo 20 lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network. This is part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. The land within Exmo20 provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond. All of which would be adversely impacted by the development at this particular site. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. PARAGRAPH 2.10, objective 8 states the objective “To protect and enhance our outstanding natural environment and support an increase in biodiversity” Development of Exmo 20 will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. POLICYPB04 states that proposed plans must not affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017 (including SAC/SPA) The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out advert effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. Policy OL09 states that “permission will not be granted for development which would result in pollution that cannot be adequately mitigated” The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send the significant increase in traffic along the boundary of the Pebblebed Heath.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB01. Policy PB01 states that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless they cannot be located on alternative sites that would cause less or no harm. It is not in accordance with the mitigation strategy. This development could be located on alternative site(s) which would cause less or no harm to the Pebblebed Heaths (SAC/SPA).

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.6. PARAGRAPH 2.6 states that 'Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development' Exmo_20 is currently open countryside, and this is not 'modest' development. It is a 'comprehensive development scheme' within a rural part of East Devon.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. TR03 states that where development is likely to generate significant amounts of vehicle movements, planning permission will not be granted unless they can identify measures to secure new sustainable travel arrangements, taking into account (amongst other things) the scale of development and the availability of public transport, and walking and cycling opportunities. Due to Exmo_20's restricted access arrangements, the development would generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring settlements using the B3179. Due to the site's steep topography and remote location from services, any walking or cycling routes will provide limited viable alternative options to using a car. The local plan notes that congestion is a particular issue in Western East Devon. This site has no access to Dinan Way and the A376, therefore the significant amounts of vehicle movements from this site will be on to the rural B roads, locally notorious for being congested, substandard and not fit for such levels of heavy traffic.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc it will not add another Doctors surgery or Dentist, both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school (a round trip of 22miiles) provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is so inadequate that sewage is discharged into the sea on a very regular basis and the beach is often closed for swimming. Exmouth's problem with sewerage has been featured on national news several times, highlighting the scale of the problem it has.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. (Paragraph 11.2 promotes focusing significant development at locations which are, or can be made sustainable, through limiting the need to travel and reduce traffic congestion). Development at this site will increase travel needs and necessitate cars to take longer routes. Housing is proposed at the southern end of the site whereas the main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of

0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive 'around and back down' (4.0-4.3 miles) to get into Exmouth centre, Making a round trip to the town center at least 8miles. Exmo_20 would increase travel needs resulting in an increased number of car journeys and requiring cars to travel more miles.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. POLICY TR01 proposes that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development. Walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people will only choose to walk if their destination is within 0.5 miles and that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion.

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.6 (within 800m of key services and facilities) It is a 'larger' development and most of the site is not within 800m (approx 10 mins walk) of any existing key services and facilities. Studies cited in the Local Plan show that people will only choose to walk if their journey is not further than 800m/10 minutes walking each way. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements

Full name: Alison Earp

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Exmouth is a tier 1 town, Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Exmouth is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360degree development impossible and with the large amount of existing development already sprawled a long distance from the town centre, any new development is closer to neighbouring towns & villages and therefore not development at the principal centre of Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location

Nadine Ebsworth

Full name: Nadine Ebsworth

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Nadine Ebsworth

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access the site via the B3179 Do not access the site via Southern Wood Do not proceed with the project

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Chris Edser

Full name: Chris Edser

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: concerns: New houses have been built in Evans Field; new houses are planned for the area between Bedlands Lane and Knowle Road.

- where are the plans to (a) expand the primary school, to cater for the additional pupils? (b) upgrade the sewer, water and electricity infrastructures? (c) widen Barn Lane to allow traffic in both directions? (d) provide a safe footpath from Evans Field to Bedlands Lane? (e) development of Bud-02 should not start without the developer committing to a safe path to the primary school - the Evans Field to Bedlands Lane path is still outstanding after 3+ years.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: see reasons stated in 2(a) above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: provide firm commitment and plans to mitigate the points raised in 2(a) above.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Rebekah Eglinton-Stafford

Full name: Rebekah Eglinton-Stafford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

In addition I am extremely concerned at the ability of exmouth infrastructure to withstand all these expansions. Traffic is already bad enough. Where are the community spaces? The parks? What about water given SWwater current performance. Will we honestly fill every field with houses? It's so disappointing EDDC, we need you to fight to preserve our landscape.

Richard John Eley

Full name: Richard John Eley

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

1.4

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: With respect, I am doubtful that the Plan can have an Introduction which uses such mangled English, has errors of punctuation, and sentences such as the final passage of Para 1.4, which is frankly incomprehensible. Footnote 2 seems to have disappeared.

My polite recommendation is that the entire Introduction should be rewritten from scratch, and then closely examined by a competent officer or councillor who can write the Introduction in clear and simple English. Basic punctuation errors should be corrected.

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The last sentence of Para 1.4 is so unclear that I am struggling to establish what you are trying to say! Otherwise see above. A complete rewrite is required.

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: I will be precise. The introduction is almost unreadable and is incorrectly punctuated. It needs to be completely rewritten by a competent person.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is important to communicate clearly and succinctly, if compliance with the duty to cooperate is to be achieved.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The Introduction is an important component of the overall Plan and should set the tone for what follows. So it must be concise and clear.

I see that the sentence below this box is not complete, and is therefore lacking clear meaning. It rather sums things up.

Full name: Richard John Eley

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

2. Do you consider that this part of the High Quality Design chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the High Quality Design chapter is not legally compliant. Please be as precise as possible.: There is some evidence that design quality has marginally improve in East Devon in recent years, but it is still very poor. We see a great deal of mass development to standard designs, almost always by Big Six developers. This will be perpetuated by the current preference for New Towns within the district. There is very little opportunity for the building of individually designed homes of obvious quality. This problem is compounded by the Council's longstanding preference for new homes with tiny rooms and tiny windows providing the minimum of natural light. I was pleased, however, to see this issue briefly highlighted in this Chapter, at long last.

There is very little chance that we will see anything different when it comes to the delivery of the new town, and Cranbrook's expansion will again see repetitive estates of monotonous design.

A possible cause of this deterioration in design standards my reflect the haste and lack of care shown with site selection in the new Local Plan, and the last one, for that matter. It is just easier to plonk a New Town in the countryside, or to allocate a big field for a couple of hundred properties. than it is to deliver a nuanced and sensitive expansion to a quiet village, or a clever enhancement of a town centre site.

We do see some interesting and thoughtful individual developments in East Devon's more protected locations, but in the West End, sadly, we are destined to see more of the same Big Six sprawl. There is clearly no commitment within the Council to do anything else.

2(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter legally compliant, in respect of any matters you

have identified above. You will need to say why each modification will make this part of the High Quality Design chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above.

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: There is simply no provision for improving design, or countering the current predisposition for large scale estate development.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There needs to be more care taken over site selection, more input from elected councillors, and the views of local residents taken into account. I feel that some more development could be accommodated in the National Landscapes if sensitively located. In this way, we could abandon the New Town or at least make it smaller, and we could reduce the desecration of the West End. I still believe that our housing allocation could be challenged, and I hope that a new unitary authority may give us more room for manoeuvre, But I accept that as a nation we clearly need more housing. Another possibility is for thoughtful redevelopment within our towns. We also must make our new homes bigger and room sizes increased. We should be building more three storey houses, and using more roof space.

4. Do you consider that this part of the High Quality Design chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the High Quality Design chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Specifically, we have not addressed the issue of the Great Exeter Sprawl with Exeter City Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Housing Design and the allocation process has been very badly handled and is a major issue.

Full name: Richard John Eley

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: I do not think that this section is sound. The Council has failed for many years to address the problems of inadequate walking and cycling provision and in particular the lack of promotion and maintenance. Our footpaths are generally in poor order and have lacked investment and care. This is partly because of the emphasis upon overly ambitious and very expensive cycle routes: I am thinking particularly of the Stop Line Way and the thus far undelivered Feniton to Sidmouth cycleway, and the poorly designed Sidford to Sidbury link.

We need a significant shift of emphasis away from cycling to walking. I am not anti-cycling, far from it. But we must recognize that six times as many people walk as cycle, and the cost of a cycleway is around a thousand times more than a footpath, both to create and to maintain. Walkers are not given the attention that they deserve. Investment is split roughly 50/50 with cyclists, which does not reflect the numbers involved.

We are wrong to adopt a citycentric approach to cars: Exeter quite rightly seeks to reduce the number of cars entering the city, for the quite proper concerns over pollution and congestion. Towns in East Devon do not have these problems on the same scale, and by and large, there is no great need to reduce cars in our towns and villages. Not least because they often do not have buses, trains or cyclewayx as alternatives to the car. Our town centres still very much rely upon cars to bring in customers, and tourists. The recent doubling of summer car park charges in our seaside towns saw a dramatic drop of 41% in carp ark usage, which will have had a massive negative impact upon our small businesses.

So we need a more subtle and thoughtful approach. And a greater emphasis upon walking as a recreation as well as a means of journeying to work or to school. In particular, we should be encouraging signed long distance walking routes to replicate the success of, for example, the East Devon Way and the Sid Valley Ring.

2(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Walking needs a much greater emphasis. Its importance for tourism is greatly under-estimated.

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: See above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above.

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter fails to comply with the duty to co-operate. Please be as precise as possible.: We should be liaising with neighbouring authorities to deliver long distance signed walking routes.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to explain why walking should be given a bigger emphasis.

Full name: Richard John Eley

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 12

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.: In my view, the language is inappropriate. Specifically, it is not reasonable to describe Coastal Preservation Areas and Green Wedges as 'protected' when Local Plan policy is to allocate development in large areas that have these designations.

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: See above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above.

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.: By effectively misrepresenting these designations, the Plan is misinforming other authorities and organizations.

Full name: Richard John Eley

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 13

2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?: Yes

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.: A long chapter, as I would expect. The Council is awash with 'green' policy, all very commendable, but rather lacking in action and actually 'doing something'. It is note worthy that the Strategic Planning Committee agreed to defer practical green policies in the Local Plan until 'the next Local Plan' which is fifteen years away.

4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Our Outstanding Biodiversity and Geodiversity chapter's compliance with the duty to co-operate, please use this box to set out your comments.: The Chapter complies, but it achieves nothing.

Full name: Richard John Eley

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 14

2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?: Yes

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Richard John Eley

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.1

2. Do you consider that this part of the vision chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the vision chapter, please use this box to set out your comments.: This section appears to be AI generated, and is therefore better written than the Introduction. It is meaningless, of course, in that it simply replicates standard expressions of absurdly optimistic expectations. But it will be legally compliant, no doubt.

3. Do you consider that this part of the vision chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: It is mindless jargon, and clearly insincere, but it will be regarded as 'sound'.

4. Do you consider that this part of the vision chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the vision chapter's compliance with the duty to co-operate, please use this box to set out your comments. : It is irrelevant and comprised of journalese patter, but it complies.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

Full name: Richard John Eley

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: The Spatial Strategy concedes from the outset that it does not define the area that it describes as 'the West End'. Yet it has policies which it applies to this non-defined part of East Devon. It then absurdly tries to define the West End as the locations where these policies have been applied in the document. A classic 'chicken and egg' position, which is surely legally invalid.

The selection of communities suitable for development/expansion is not determined by their suitability but solely in accordance with their size.

It seems to me that site selection should be determined by the suitability of individual sites, rather than by categorizing communities as a whole within a meaningless 'hierarchy'.

The Strategic Planning Committee were preoccupied with the hierarchy of individual villages without any consideration as to their suitability for development.

This obsession with hierarchy and the rushed allocation of sites meant that the selection of sites took place before Built Up Area boundaries were determined. This meant that many suitable sites were not allocated despite being subsequently included within the BUABs. Effectively, this ensured an unnecessary over allocation. And the selection of sites that were clearly far less suitable than those identified within the newly extended BUABs. I cannot claim to know whether this muddled and illogical

procedure is not legally compliant, but I do know that it is irresponsible and unreasonable.

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

See above. The correct procedure should have been to establish a methodology that identified the best sites for development rather than the best communities for development. The Spatial Strategy should have identified a procedure for choosing sites rather than a hierarchy of settlements which would determine where development should occur. For example, villages were tiered for development irrespective of the road network that served them.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: See above. The entire process was illogical and based upon a false hierarchical analysis.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Individual sites should be selected in accordance with general planning policy. Each community within East Devon should have been looked at carefully to determine how much development is reasonable overall, and where that development should occur. Instead, 'blanket' allocations were effectively delivered as a result of a hierarchical structure determined almost entirely by the size of the community.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There is little evidence that the methodology employed by EDDC arose from any discussions with neighbouring authorities and/or organizations. Nor was the methodology explained properly to members or to the wider public. It was, of course, very rushed, although much time was wasted on pointless debates about hierarchy. In particular, officers imposed the second New Town (after Cranbrook) upon members of the Strategic Planning Committee, who were clearly unhappy to be 'bounced' into this

outcome. The majority of responses to the first consultation were broadly against another New Town, especially as it is going to be very close to Cranbrook, and will mean a huge increase in Greater Exeter sprawl.

The second New Town is supported by very little infrastructure, will have limited open space, and is clearly lacking in basic amenities and adequate roads.

The Clyst Valley Regional Park will no doubt be as elusive as Cranbrook's town centre, and as likely to work well as Cranbrook's much vaunted but malfunctioning central heating system. The Clyst Valley Regional Park is perhaps van attractive idea, but it is ill-defined and very costly to deliver. And it is not an ambitious 'park' but simply a hotch-potch of land largely owned by the National Trust, and so offers very little 'new' green space. The new community will be served largely by the A3052, which is already gridlocked on a regular basis. We simply do not have the infrastructure to support the new community, either in respect of roads, or with regard to, for example, sewerage. Anyone who watched SPC meetings will recall that almost every site allocation was offered little in the way of transport links other than the prospect of a Co-Bikes installation, whereupon the company providing this pathetic service promptly went bust.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : The rushed, ill-judged manner in which the Plan was delivered needs to be explained and discussed. In particular, council members did not challenge many of the policies and allocations, or the procedures that were employed. It was very much officer led.

Full name: Richard John Eley

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: My view is that this 'West End' Chapter is excruciatingly written and fundamentally dishonest. We know (not least from our experience with Cranbrook) that the development will not be of high quality and will not be undertaken by local developers. Design is very unlikely to be of a high standard: the house will be small, have tiny rooms, tiny windows and tiny gardens. There is likely to be inadequate community services, and little open space. 'Active travel' is a flagrant euphemism for 'wholly inadequate transport provision'. It is extremely unlikely that the development will have any local characteristics, and it will doubtless be indistinguishable from countless others of similar ilk found all over England.

This chapter is therefore especially disingenuous and simply dishonest. This is why the presentation style is close to nauseating and beyond parody.

It is wretchedly, profoundly and unpleasantly dishonest.

I hope this means it is not legally compliant.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I would urge the description of the planned new community to be entirely rewritten in a much more accurate and less

deceitful way. We should make it clear that this will be mass housing, that services will be limited, and that we are effectively creating another new suburb for Exeter.

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I see no purpose in the chapter describing a development in such a meaningless and frankly ridiculous way. Surely, something so false cannot be 'sound'.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I respectfully suggest that a simple, accurate, realistic and fact-based description of the New Community is required.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I do not think that the creation of a Greater Exeter has been properly debated, and the suitability of the location has not been fully explored. I particularly feel that the ludicrous over-optimistic presentation is wholly inappropriate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I think we should consider whether the West End should be properly defined. I think we should discuss whether the scale of development in the West End is advisable (I think housing could be potentially provided elsewhere in East Devon. I think we should consider whether economic development could be encouraged elsewhere in East Devon, especially tourism. And I think we need to closely examine infrastructure requirements, especially roads. Although our draft Local Plan talks lengthily about dealing with climate change, and health and wellbeing, it is notably lacking in any details as to how this is going to be achieved.

I would also like to see economic development being married to specific proposals to improve our clearly struggling town centres, as opposed to concentrating all economic activity in Exeter.

Full name: Richard John Eley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In respect of Sidmouth, I consider that the identification of the BUAB should have preceded site selection. I also do not think that the site either side of Fortescue Road should have had the area intended for community open space in The Byes deleted. This was undertaken without the consent or knowledge of the applicant, and I would like to see the legality of this procedure questioned and examined. The deletion arose from a mistake, as was conceded in a SPC document, but this mistake was then repeated. I very much doubt that this was legally compliant.

In the case of the Sidbury allocation at Furzehill, this site was selected by the SPC because it did not have an adequate access and would not therefore obtain planning consent. I do not believe this is a legitimate mechanism for site selection. Confirmation of this is available on Youtube.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The Fortescue Road site has never been scored or assessed and has therefore not been considered at all by the SPC. Instead, officers independently and without authorisation from the landowner/applicant, submitted a very different proposal which was much less attractive and deliverable.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

I think all submissions should be treated equally and fairly, and I think all mistakes, which are bound to occur, should be admitted rather than denied. They should then be corrected in order to allow all sites to come forward and be fairly considered.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The Fortescue Road site should be reconsidered as a matter of urgency by the Strategic Planning Committee, as should the Furzehill site. I do not think it is proper for sites to be allocated on the basis that they cannot be delivered.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

I think all submitted sites should be considered, and officers should not be allowed to unilaterally and very significantly, and without the knowledge, let alone agreement, of the applicant.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

I would like the legality and fairness of the procedures adopted for Sidmouth and Sidbury to be explored.

Full name: Richard John Eley

Proposal:

6. Mitigating Climate Change

1. To which part of the Mitigating Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

6.1

2. Do you consider that this part of the Mitigating Climate Change chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Mitigating Climate Change chapter, please use this box to set out your comments.:

The Chapter is clearly legally compliant and quite well written. It is a measured document, and addresses the climate emergency. My only adverse comment is that the Chapter deals with 'saving the planet' rather than more local considerations. But other sections will no doubt address this concern.

3. Do you consider that this part of the Mitigating Climate Change chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Mitigating Climate Change chapter, please use this box to set out your comments.: See above.

4. Do you consider that this part of the Mitigating Climate Change chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Mitigating Climate Change chapter's compliance with the duty to co-operate, please use this box to set out your comments.: See above.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Richard John Eley

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

7.7

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:

I do not think the reference to the University of Plymouth is relevant or warranted. Plymouth asked EDDC to cooperate with their study, and perhaps EDDC was flattered to be invited to participate. But this is not a reason for siting this particular study in the draft Local Plan.

Perhaps fortunately, the Plymouth study (which I believe was conducted in 2017) is already somewhat discredited and the methodology has been widely criticised. Specifically, the predictions for Sidmouth, which were very alarming, have not proved to be accurate, as erosion has occurred at a much lower rate than Plymouth anticipated. It is still early days, of course, but it already seems inappropriate to give any greater importance to the Plymouth study than to the many others that have been delivered over the years. The SMP predictions have proved to be much more accurate thus far.

In my opinion, the Plymouth reference should be deleted and should not be part of a Local Plan.

2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above.

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.: Apart from the inclusion and over-emphasis upon the Plymouth report, the chapter is balanced and well written.

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Adapting to Climate Change chapter's compliance with the duty to co-operate, please use this box to set out your comments.: The overall policy is in line with other coastal authorities.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Richard John Eley

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 8

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: This Chapter is a vast improvement upon the extraordinary Policy 41 that appeared in the earlier draft version of the Local Plan. Policy 41 required the building of extremely high numbers of specialist accommodation for elderly people. This would have grossly distorted the housing market, and would have hugely reduced the provision of affordable homes for younger people. Policy 41 was the result of poor arithmetic, the details of which are no longer relevant. This new version is a great improvement. Thank you for changing it so completely.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: See above.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.: See above.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Richard John Eley

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not legally compliant. Please be as precise as possible.: This policy has been refined and improved, so my concerns are somewhat reduced.

However, with current policy, which it is proposed to continue for the duration of the Plan, we will see a continued decline in our tourism industry and a further trend towards downmarket tourism. Specifically, current policy allows hotels to close, but precludes new hotels to open, except in unusual circumstances. In the UK, the number of hotels is slowly but steadily increasing, whilst in East Devon they are in decline. We must ask why. East Devon remains an attractive tourism destination, but hotel guests, who spend much more than other tourists, are declining in number. The explanation is surely that planning permission for new hotels is very difficult to obtain, but permission for closure and replacement with residential development is much easier. In Sidmouth, we have lost 75% of our hotels in the last 50 years, and the trend is continuing: most recently we have seen the loss of the Fortfield and Glendevon hotels to residential development, and the closure of the Sidholme Hotel with the same outcome very likely. No new sites can be delivered in Sidmouth, as all suitable locations are outside the BUAB, and thus undeliverable given current planning policy.

We know that new hotels are likely to thrive, because we see the Premier Inns at Exmouth and Seaton apparently flourishing. Likewise the much improved and upgraded Lymptstone Manor and The Pig at Combe.

The problem is that EDDC does not appear to know that many hotels have closed. The Council still believes that the Brownlands Hotel in Sidmouth is open even though it closed and was changed to residential use twenty years ago.

This aversion to hotels, which offer all year round staff jobs, and bring high value business throughout the year, is matched by an enthusiasm for camping and caravan sites, which are often a blight in the countryside. Whilst East Devon's hotels are closing quite rapidly, they are being replaced by unwanted development in the countryside and second homes. East Devon has far more caravan parks than any other Devon district.

Tourism, especially with quality hotels, is important and offers well paid jobs, training and career opportunities.

This Chapter does not include any policies for improving our town centres and making them more attractive and viable. There is the feeling that the Council has given up on tourism and would prefer industrial sites instead. We need a more balanced economy that is less Exeter-focussed, and supports our Tier 1 and 2 towns. We also need to support our villages and the shops, pubs, and community facilities they provide. We could for example promote cultural activities and health and wellbeing, by encouraging walking and cycling, especially the former, which could greatly improve the local economy if supported and promoted. Sports such as golf can generate a lot of economic growth if they were to be encouraged.

2(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A specific section on promoting new hotels and supporting those already operating should be included. A section on the economic benefits of sport and recreation should also be added. We also need to identify how we can improve public realm, and address the continuing decline and deterioration of the condition of our town centres. We must raise our game, and identify policies to improve the presentation of our towns and villages, and to attract more upmarket visitors, especially during the shoulder seasons and the winter.

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: See above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above.

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Supporting the Economy and Town Centres chapter's compliance with the duty to co-operate, please use this box to set out your comments.: See above.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to discuss the benefits of encouraging new hotels, improving the appearance of our town centres and promoting recreation, health and wellbeing to support our tourism economy.

Mrs Faith Elford

Full name: Mrs Faith Elford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly nearer to Budleigh than Exmouth making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh would be the preferred choice for residents of the development. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Rebecca Elliott

Full name: Rebecca Elliott

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:
I don't understand why the homeowners in the CCMA aren't allowed to enjoy their properties in the same way as others

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: There is no evidence in the public domain to support the erosion rates used and its significantly more extreme than other recent studies.

I regularly walk the coast path down Cliff Road. Your proposal will blight this area and impact tourism and the local economy

3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Use the BMP erosion rates

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rebecca Elliott

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: Yes

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: I do not feel that a CCMA should be imposed for Sidmouth because:

1. I do not believe that the evidence on which the rate of erosion used in the Local Plan is sufficiently accurate. The University of Plymouth study erosion rates vary significantly from the 2016 BMP and the 2010 SMP (even taking into account the LP comments that the erosion rates used are worst case scenario). I feel it is unnecessarily creating scare tactics that will impact property values, saleability and resident morale - the LP is at risk of blighting an entire area of Sidmouth that is frequented daily by tourists (on whom our local economy depends) who walk the South West Coast Path. If the area becomes blighted, this will be picked up by the media (in the same way that the cliff fall did on Peak Hill) and I fear will discourage the tourism industry.

I note that East Devon DC has changed the erosion rates used in the different drafts - if your source data was considered reliable, then this would not have happened. I propose that the Local Plan should use the same data used by the BMP as that appears to be the most reliable.

2. Whilst the wording of the LP nods to the fact that it assumes no sea defence work, this seems a step too far when in fact there is an existing and current Beach

Management Scheme that has secured £16.5million of EA funding (in 2023). I propose that the LP is redrafted to acknowledge there is an active plan and at the very least commit to a 6-12 monthly annual review with updated erosion rates and maps.

3. EDDC is opening itself up to legal challenge from Cliff Road residents if it imposes the LP as drafted (with it's far reaching implications) given it's repeated failures to address the accelerated cliff erosion which has occurred directly as a result of the 1995 sea defence work for the town. At that time, EDDC committed to East Beach replenishment of shingle that would have provided some protection from erosion - but that has never been undertaken. Furthermore, there has been many attempts to implement a Beach Management Plan and each time the residents of Cliff Road were assured that action was being taken. The 2016 BMP took 4 years to complete and, 9 years later, we have yet to see any work being started.

4. The CCMA provides far reaching restrictions on the rights of homeowners to peacefully enjoy their own properties due to the proposed imposition of development and extension. This also will impact the ability of homeowners to sell their properties which in effect will blight an area of Sidmouth that is frequented daily by tourists. I do not relish the media coverage of the town that will ensue (although there would be valid argument to reduce our Council tax bandings when property values plummet!)

5. As far as I know, no effort has been made by EDDC to ascertain actual erosion rates and visit the properties on Cliff Road for actual, accurate source data. I do not believe it is equitable to impose such far reaching restrictions and implications on homeowners by basing the Plan on spurious data that is at odds with other studies.

6. If the erosion rates used in the Local Plan are accurate then this has far reaching implications for the town of Sidmouth and it's propensity for flooding, not to mention the newly rebuilt Alma Bridge with accompanying financial commitment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have

identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: I strongly feel that the Local Plan needs to adjust it's basis of data to the Beach Management Plan for the above reasons. However if this is not done, then at the very least I suggest that the Local Plan commits to annual reviews an amendments of the erosion rates and relevant sections of the Plan.

7.7. We have collaborated with the University of Plymouth to predict coastal erosion and flooding, mapping areas vulnerable to coastal change over the next 20, 50, and 100 years. This work, aligned with the National Planning Policy Framework, forms the basis for identifying Coastal Change Management Areas (CCMAs). Detailed assessments, such as Beach Management Plans, have refined these areas and we acknowledge that there are differences between different studies.

7.7.1 Coastal erosion retreat rates should and will be monitored on at least an annual basis and future shoreline positions updated in the Local Plan using the most recent retreat rates, particularly where new coastal defence works have occurred. Specifically, given the planned and imminent coastal defences for Sidmouth's East Beach, reassessment of future shoreline predictions at East Beach will be essential as soon as works are started as will amendments to Coastal Change Management Areas (CCMAs) where indicated.

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Simon Elliott

Full name: Simon Elliott

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:

I consider it to be restrictive to the human rights of the individuals directly affected and therein not compliant with human rights law. I believe the information being used for erosion in this area is out of date and unrepresentative of the actual detail.

2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Sections 7.6 to 7.9 should be removed so as not to have a detrimental effect on the homeowners in Cliff Road and the adjoining area.

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: The erosion rates specified are incorrect. None of the property owners in Cliff road have been asked to provide information on the actual erosion they have experienced or provided access for independent assessment. All property owners in Cliff Road agree that the Erosion rates specified are wildly over exaggerated. The CCMA is punitive to the homeowners in this location. To prevent them being able to extend, modify or rebuild will unnecessarily blight these properties. No account has been taken of the Beach Management Scheme which has agreed funding exceeding £16M to reduce erosion on Sidmouth's East Beach. The erosion prevention work is a direct result of sea defence works carried out by the council in 1995. At that time it was agreed that the works would

worsen the erosion of the east beach area and therefore regular beach replenishment would be undertaken to shore up the cliff defences. This has not happened and therefore the Erosion is not significantly related to Climate change, more that it is a direct effect of poorly executed human intervention.

3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: Sections 7.6 to 7.9 should be removed so as not to have a detrimental effect on the homeowners in Cliff Road and the adjoining area. It should not prevent home owners from renovating their homes (with planning permission) It should have a means of being revoked if the data is proven to be incorrect or the data changes due to preventative works (Such as, but not limited to, the Beach Management Plan).

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There has been no direct liason between the authors of the CCMA and the property owners. The CCMA will have such a significant effect on the home owners and local residents that it is unreasonable not to have made direct representation of the plan. Many of the residents are elderly and do not regularly use the internet, none have received any direct form of communication from the people proposing the CCMA. How can this meet any duty to co-operate?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: For the reasons I have previously outlined I do not trust the authors or those undertaking the CCMA to use up to date information or communicate adequately with the residents. The residents are the people best positioned to provide the up to date information sorely missing from the CCMA . It should also be their right to peaceful enjoyment of their possessions, which to date does not seem to have been considered.

Janice May Ellis

Full name: Janice May Ellis

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Mrs Margaret Elms

Full name: Mrs Margaret Elms

Proposal: 16. Community Facilities

1. To which part of the Community Facilities chapter does your representation relate?: Policy

1(a). Please write down the paragraph or policy number that your representation relates to.: CF01

2. Do you consider that this part of the Community Facilities chapter is legally compliant?: Yes

5: CF02 also necessary though likely to lead to dispute on occasions.

3. Do you consider that this part of the Community Facilities chapter is sound?: Yes

4. Do you consider that this part of the Community Facilities chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mrs Margaret Elms

Proposal: 16. Community Facilities

1. To which part of the Community Facilities chapter does your representation relate?: Policy

1(a). Please write down the paragraph or policy number that your representation relates to.: CF02

2. Do you consider that this part of the Community Facilities chapter is legally compliant?: Yes

5: I agree and am glad to see included justification 16.3 - use of private houses.

3. Do you consider that this part of the Community Facilities chapter is sound?: Yes

4. Do you consider that this part of the Community Facilities chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Mrs Margaret Elms

Proposal: 17. Implementation and Monitoring

1. To which part of the Implementation and Monitoring chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph or policy number that your representation relates to.: 17

2. Do you consider that this part of the Implementation and Monitoring chapter is legally compliant?: Yes

3. Do you consider that this part of the Implementation and Monitoring chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Implementation and Monitoring chapter, please use this box to set out your comments.: Clear and fairly concise.

4. Do you consider that this part of the Implementation and Monitoring chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: 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.

Robert Elston

Full name: Robert Elston

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Louis Eriksson

Full name: Louis Eriksson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed development at Exmo_19 will destroy a beloved local area of natural beauty and prevent it from being enjoyed by future generations. Furthermore, the planned area is too far from the local amenities and the existing transport infrastructure is insufficient to sustain such a large estate.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This area should be reconsidered, and protected from future developments.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Liz Evans

Full name: Liz Evans

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, School, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

Furthermore, Exmo_20 would cause harm to the heritage assets at this Medieval settlement, most significantly St John in the Wilderness Grade II listed church, eroding the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

EXMO_20 would also have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the tranquillity, wildness and dark skies, which is contrary to POLICY OL01.

As well as all this, Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan. Do not access the site via the B3179. Do not access the site via Southern Wood.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Tom Evans

Full name: Tom Evans

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at EXMO_20 could and should be located on an alternative site where it would cause less and or no harm to the pebble bed Heath (SAC/SPA) developing EXMO_20 is contrary to policy PB0 one of the local plan and not to in accordance with the mitigation strategy

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Howell Martyn Evans

Full name: Howell Martyn Evans

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than it is to Exmouth, making Budleigh clearly its most convenient and accessible town. The services and infrastructure of Budleigh (viz., the High Street, Budleigh Medical Centre, schools, the branch Library, the beach and Otter Estuary etc.) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected, one which was available, achievable and suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology and POLICY PB01 of the local plan, and is not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Mediaeval settlement, most significantly the Grade II* listed church St John in the Wilderness, eroding the attractive rural setting of worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally-designated wildlife sites, eliminating the ‘tranquility, wildness, and dark skies’ - contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species-rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04, since the Habitats Regulations Assessment (30-01-25) states that there is ‘currently not sufficient certainty to rule out adverse effects in integrity in relation to ... air quality (“East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The main site access proposed is opposite the SAC/SPA.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would exacerbate the already-identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 the energy hierarchy, and would increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development because residents would need to travel much further than 800 metres to reach existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as a preferred choice of transport. This is contrary to POLICY TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I wish to hear for myself the reasoning and arguments for and against the position that is adopted.

Brian Evans

Full name: Brian Evans

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This form contravenes the EDDC policy of Equality Diversity and Inclusion, and the Equality Act 2010. It is not legal to discriminate against any particular population sector. This form discriminates against several, including those not computer literate or lacking suitable equipment. It is clear that this process of presenting comments, as applied to Feniton, has been created in a legalistic and highly bureaucratic way. This makes it difficult and daunting for many people to make their comments known. This is obviously discriminatory and undemocratic. In addition, a petition signed by more than five hundred residents (more than 25% of the population) has not been taken into consideration, as it was not submitted via the CommonPlace software, and the Strategic Planning Committee did not report the petition to EDDC, which consequently does not take these comments into account. It is therefore not democratic.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Correct the errors identified in 3(b) above

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: (1)

Completing such a complicated and legalistic form is difficult, time consuming and daunting to many. This makes it discriminatory.

(2) Feniton is known to suffer frequent serious flooding, by both storm water and sewerage; the new Flood Alleviation Scheme is designed to reduce flooding under present conditions, and does not take further development into account, nor the more extreme events forecast due to climate change.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy AR01 – C

Lack of Sustainability:

- EDDC agreed with the Planning Inspector at the 2014 Super Enquiry that Feniton was not a sustainable location for further development, and nothing apart from the untested Flood Alleviation Scheme has changed within the village to address the issues raised in that Super Inquiry.
- The only effective public transport is the railway, with trains running at two-hour intervals throughout much of the time.
- All of the roads into Feniton are narrow with pinch points, are unlit and unsuitable for heavy traffic.
- Feniton has recently had some experience of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were considerable, and walking in the area became significantly more dangerous.

- When Pattlesons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are quite unsuitable and unsafe for heavy traffic. All these roads are also much used by pedestrians.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- By proposing the current development plan, EDDC is disregarding not only much evidence of unsustainability, it is disregarding its own policy as stated in the Local Plan. It is also therefore also inconsistent with the national Plan.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses for a Tier 4 community:

- Devon Communities Together (DCT) - funded by EDDC - identified a local need for only 13 dwellings up to the year 2027. The number of houses planned for Feniton in the draft plan is disproportionate and does not align to the DCT survey.
- The Strategic Policy SP01 in the Regulation 19 version was belatedly rewritten in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' as stated, but massively out of proportion for the size of community, especially when compared with development plans for other communities in the area.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location, mainly due to poor and dangerous access. The entrance to the site is off Green Lane - a mostly single-track road, widely used by pedestrians. It is unlit, with several blind rises and bends, no pavements (or space for them) and two single-track bridges. The blind junctions at either end of this lane are dangerous, even for small vehicles.
- Feni_08 is also accessed via Broad Lane, which has very similar issues to Green Lane.
- Site Otry_20 was presented after the Regulation 18 draft consultation, giving EDDC insufficient time to properly consider the evidence.

- The size of Otry_20 does not align with EDDC's Spatial Strategy and in area is completely disproportionate to the scale of Feniton, which is Tier 4. The allocation for industrial, warehousing and distribution is also quite disproportionate when compared with similar sites allocated for the Principle Centre Tier 1 Exmouth, Tier 2 Axminster, and Tiers 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If the new draft Local Plan is to be sustainable, as stated by EDDC, Feni_08 should be removed, or drastically reduced at a minimum, and Otry_20 should be altogether removed, as its negative impacts will far exceed any potential positive effect.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Dr Christopher Everall

Full name: Dr Christopher Everall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: *

??The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Dr Christopher Overall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is not in a town and access is to a rural B road that does not lead to Exmouth. it would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. There are no cycle lanes or pavements into Budleigh Salterton so people will drive.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The vehicular access needs to lead into Exmouth to connect it to the town. not onto the B3179. PReferrably alternative sites should be developed within the bpundary of Budleigh or Exmouth with cycle lanes and walking routes that are useable.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Elizabeth Everett-Wright

Full name: Elizabeth Everett-Wright

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo -20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo-20 is contrary to POLICY PB01 OF THE LOCAL PLAN AND NOT IN ACCORDANCE WITH THE MITIGATION STRATEGY. Exmo _20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800 metres to existing key services and facilities, contrary to PARAGRAPH 11.6 It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, School, beach, etc.) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove from plan or greatly reduce the size of Exmo_20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Leigh Extence

Full name: Leigh Extence

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to BudleighSalterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the Local Plan. An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would cause harm to the heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship & burials which currently exists. This is contrary to POLICY HE02. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth,

which is already beyond its design capacity. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jed Falby

Full name: Jed Falby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is too big and will be too visible if built as currently planned on the high road B3179 (Ting Tong).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refuse, revise and improve a project that is far too imposing on our beautiful countryside.

Full name: Jed Falby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: IT BUILDS A MUCH BIGGER SUBURBAN TOWN JOINING EXMOUTH TO BUDLEIGH SALTERTON Contrary to Policy OL05 of the Local plan

THERE MUST BE A BETTER SITE FOR 700 HOMES!

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: REMOVE Exmo_20 from Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Exmouth is building too close to Budleigh Salterton.

EXMOUTH IS STEPPING ON BUDLEIGH SALTERTON'S TOES!

Full name: Jed Falby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

MD Fallows

Full name: MD Fallows

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As a resident of Gittisham for 40 years I am well acquainted with the geography and planning history of the area.

I wish to object to the proposals for further development East of Hayne Lane, both North and South of the railway line.

The development that has already taken place is of a ribbon nature: access from residential and industrial developments is linear and leads onto poor and narrow roads.

Any further buildings will only result in more traffic pollution and unsatisfactory access for resident or businesses.

Gittisham Parish council have already submitted formal objections: I append their objections below and concur with all of the points made.

OBJECTION - LOCAL PLAN CONSULTATION DRAFT

STRATEGIC POLICY SD03 : Honiton and it's development allocations. Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be unsurmountable. If the site cannot come forward within the plan period for development then it should not be allocated.
- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation
- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land

- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;
- The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.
- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary

school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.

- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

Andrew Farley

Full name: Andrew Farley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. * The Habitats Regulations assessment (30.01.25) confirms that there is?"currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. " Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jennie Fawcett

Full name: Jennie Fawcett

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh it's most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, Schools, beach etc) would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh & Exmouth, contrary to POLICY OL05 of the Local Plan.

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to ...air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. the main site access proposed is opposite the SAC/SPA.

An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available, achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths (SSI/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan. Reduce the size of Exmo_20. Don not access the site via the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Darren Fellows

Full name: Darren Fellows

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Jenny Fells

Full name: Jenny Fells

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These are my points regarding Whim_08 site

- The size of the developement seems out of proportion to the size of the village
- Lack of pedestrian access to amenities is of GREAT CONCERN
- This site is preferable to others insofar as the amount of traffic passing 'through the square' will be somewhat less with this plot of land than with many of the others, but any increase will be most unwelcome
- Further work must be done to understand the nature and extent of flood risks. For example, surface run off cascading into Cobden Lane and the village square would be disasterous The professional judgement of the planning officers was that this site is not suitable. Why seek professional advice and then ignore it?

i think that it would be preferable to have additional housing built near to Hand and Pen or for the Cobden Lane site to be increaed. Both of these sites would prevent a large increase of vehicular and pedestrian traffic funneling in and out of Whimple square on a very inadequate road.

The only other way i can think of to increase housing but not traffic, would be to build a retirement village. This would also have the benefit of releasing family houses onto the open market.

Martin Ferdinando

Full name: Martin Ferdinando

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In 2022 when researching the purchase of my property in Sector Lane, I confirmed with East Devon Council that the land in question had been removed from the local plan due to inadequate access when the funding of a relief road was removed and that agricultural pollutants in the soil were too high. I was assured that no homes could be built on this land, indeed no applications for building would be considered for at least 20 years. On that basis, I purchased my property. The land has continued to be used for the grazing of sheep and cattle and is regularly sprayed with farm manure to help fertilize the healthy growing of pasture for grazing. So, how has the level of nitrates and phosphates now reduced making it safe for residential development? The access road has not been built and the plan uses a completely meaningless and woolly statement 'Sector Lane should be reconfigured'. How? The road outside my property, 'Wilwyn' is not wide enough for two vehicles to pass. Vehicles have to pull on to my driveway to pass. This includes HGVs, agricultural vehicles, vans and cars. My driveway is not designed for such weight/usage. How will I be compensated? The plan infers that Sector Lane be closed to through traffic, but how will the daily milk tanker access the nearby farm? The 'other end' access point is too steep/narrow and bendy for such a vehicle? There is no footway outside my house. The suggestion that Sector Lane is a suitable pedestrian or cycle route for not only the 225 dwellings on this plan, but the 100 on the land East of Lyme Road is laughable. It will be dangerous, even if the road is no longer a through road, the users of the existing residents of Sector Lane and its various cul de sacs mean the road is almost constantly in use by vehicular transport. Weycroft Bridge is a Grade 2 listed bridge, already subject to 4 way traffic lights and regularly floods. Additional traffic will endanger the bridge. The additional housing will create faster rain water run off, increasing the risk of flash flooding. Nearby Stoney Lane is regularly blocked with excessive vehicles, particularly when infrastructure failures have

occurred on the Chard Road, creating gridlock. What arrangements are in place to mitigate this? There is nothing in the plan that explains this. The report keeps using words like 'potential' and 'should', 'maximise' and 'sustainable', none of which this plan displays. The plan refers to the railway but on numerous occasions when I have used the railway, the allocated trains have been packed or formed of just two carriages. What is in place to ensure the rail provision is improved? 'Should' doesn't mean it will. There is no youth provision in the town. No open Police station. Inadequate dental practices and health centres. Lack of local shopping facilities will mean more traffic on to already congested roads. No multi faith provision for the increased diversity of existing residents, even before these hundreds of new properties are built. The stench of sewage from the local sewage farm and the clear evidence of pollutants entering the water course proves the existing facilities cannot cope with existing use. These additional properties will be an environmental catastrophe.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of the area GH/ED/80a from the plan. Axminster has already expanded far faster than most other areas of Devon. Whilst it is understood Axminster is surrounded by National Landscape and protected areas, high density housing squashed into Axminster will undoubtedly affect the surrounding countryside from increased traffic, light pollution, noise, antisocial behaviour and damage to farm land.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I was previously assured that this part of the plan had been removed following the removal of funding for a suitable bypass and the agricultural pollutants in the land. This was in 2022. Nothing has changed since then to make it 'sound' so therefore it should be removed from the current plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Since the area in

question should no longer be in the plan, the only modification would be to remove it and consider alternative locations.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I do not believe there has been adequate consultation with those likely to be most affected.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I do not trust the my views or those of many of the current residents of Axminster have been adequately considered.

Roger Fetherston

Full name: Roger Fetherston

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than it is to Exmouth by a considerable distance. This fact alone makes Budleigh the obvious and most convenient local town. The services and infrastructure of Budleigh would logically be the preferred choice for residents of Exmo_20. In effect Exmouth and Budleigh would merge separated by little more than Knowle recycling centre. This completely undermines the settlement hierarchy contrary to POLICY OL05 of the local plan.

An alternative site to Exmo_20 should be selected one which was available, achievable, and suitable in the HELAA. Exmo_20 would cause harm to the adjacent, precious Pebblebed Heath/s (SSSI/SAC/SPA?NNR) due to Exmo_20 being a supportive foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would cause harm to the heritage assets, most significantly the grade II* listed St John in the Wilderness (Saxon, Norman, Medieval site), dramatically and irrevocably altering the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

Exmo_20 would have a detrimental effect on the adjacent internationally designated wildlife sites and destroy the 'tranquility, wildness and dark skies ' of the countryside, which is contrary to POLICY OL01.

Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors contrary to PARAGRAPH 13.23 of the Local Plan. it would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulation Assessment (30.01.25) states that there is ' currently not sufficient certainty to rule out adverse effects in integrity in relation to ...air quality (East Devon Pebblebed Heaths SAC?SPA) such that the Plan fails the integrity test.

Development of Exmo_20 on heavy clay subsoil with ineffective soakaways would significantly exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. Further impervious surfaces inevitable in the construction would rapidly speed up surface run off further adding to flood risk below this proposed sloping site directing all water towards Exmouth. This proposed development is in conflict with POLICY AR01B

Exmo_20 would increase the need for car travel, contrary to Figure 7 the energy hierarchy, and would increase traffic congestion, in conflict with PARAGRAPH 11.2. The peripheral and isolated location represents unsustainable development because residents would need to travel much further than 800 metres to reach existing key services and facilities contrary to PARAGRAPH 11.6. It is too far, with relatively steep slopes , from any town centre to use walking or even cycling for all but the very fittest, as their choice of transport and certainly not for those with disabilities and walking aids. This is contrary to POLICY TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Greatly reduce the size of Exmo _20. The proposals are unsound and will for ever damage the environment that renders East Devon attractive.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I believe my voice and opinions are of value and written responses do not fully inform the debate which is needed on such profound proposals which will, if passed, see the permanent destruction of rich open land threaten so much more. There are other solutions to housing needs.

Marcia Fletcher

Full name: Marcia Fletcher

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Its time that EDDC pushed back against the Government with the truly valid reasons for not building on this site as well as the poor infrastructure and in particular the ongoing situation with South West Water.

I agree that housing is needed for the town's residents, but this aspect does not seem to have been discussed or agreed anywhere. Bloor was not able to answer who the houses would be aimed at and the last thing the town needs is purchasers who only want second homes. This only kicks the ball down the road. There has been no assurances by the developer of the number of affordable housing (what actually is affordable?), no clear commitment on the size of houses to be built – the town needs more starter homes for young families and smaller homes for elderly residents to downsize into thereby releasing larger family homes.

There needs to be a better process in place to decide what the need is in the town for housing rather than the Government dictating what it wants to 'tick an election commitment'. That approach is lunacy and not democratic or reflective of what the town needs and can accommodate.

James Forbes

Full name: James Forbes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: No response has been given to the comments made by a large number of Feniton residents and Feniton Parish Council, during the Regulation 18 consultation stage, concerning the sites selected in Feniton for housing development. It, therefore, appears that these comments have not been conscientiously taken into account when including these sites in the Regulation 19 draft Local Plan.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The comments made by Feniton residents and Feniton Parish Council should be responded to in a manner that makes it clear that they have been conscientiously and fairly considered by the Strategic Planning Committee. Alternatively, the number of houses allocated to Feniton in draft Local Plan should be substantially reduced.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Feniton is not a sustainable location for the number of houses allocated to it in the draft Local Plan. The roads and pavements are inadequate, there continues to be problems with its drainage, public transport is infrequent, there are limited local employment opportunities, the local school is over capacity, the nearest GP practice is over subscribed and NHS dental services are inadequate. This all accords with the

conclusions of the Planning Inspector at the Super Inquiry in 2014 that Feniton was not a suitable location for sustainable development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The number of houses allocated to Feniton in the Local Plan should be substantially reduced to a number that it can sustainably support.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: James Forbes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The site Otry_20 was introduced late in the Regulation 18 stage of the Local Plan consultation process, giving Feniton residence and Feniton Parish Council limited time to comment. The comments that were made were not discussed at the Strategic Planning Committee meeting and Feniton Parish Council was not allowed to express its views at this meeting. Thus, the process by which this site was selected for inclusion in the Local Plan does not appear to have been fair. In addition, the site does not comply with the relevant East Devon District Council employment development policies, SE02 and SE03.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site should be removed from the Local Plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site does not comply with the relevant East Devon District Council employment development policies SE02 and SE03.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site should be removed from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: James Forbes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The site Otry_20 after the Regulation 18 draft consultation giving very few Feniton residents an opportunity to comment. The 4.6 hectares allocated to this site is disproportionate to the size of Feniton (Tier 4). When the site proposal Otry_20 came before the Strategic Planning Committee, Feniton Parish Council was not allowed to comment.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Feniton residents and Feniton Parish Council should be given adequate opportunity to comment on the proposal.

Jill Fowler

Full name: Jill Fowler

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. (The roads are fast and dangerous with blind bends and there are frequent accidents). This is contrary to POLICY TR01.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Jill Fowler

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The road is already dangerous with blind bends and several accident blackspots, and in close proximity to a riding school.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Rosie Fox

Full name: Rosie Fox

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: I am supportive of many elements of the Local Plan and think you have done a great job at setting a vision for the area's future. I am particularly supportive of the growth of Cranbrook and the creation of a second new town in the area: I think this strategic, large-scale development, with beautiful and relatively high-density housing concentrated in a few strategic locations, is the best way to meet the high housing targets (which I also support) in the area.

Chloe Fox

Full name: Chloe Fox

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to, and disagree with, the stated proposal to build on the site Exmo_17 in the Draft Local Plan, due to the following reasons.

1 One has to take as the worst case scenario, that every resident of Exmo_17 is going to pave over the green space their property might contain, which would cause substantial runoff and trickle-down in southerly and easterly directions from the site. Lower Littleham, where any runoff will end up, already has ongoing flooding issues extra to the flood defence trough. Castle Lane floods every single time we get heavy rain, which is only set to increase according to the Met Office. Littleham Brook overtops regularly flooding both Castle Lane and Littleham Road at the junction by the Bridge. This is a major traffic route taking hundreds of thousands of car journeys a year and any runoff tending towards it, must be avoided. There are simply not enough mitigations that could be made to offset the runoff from a site of 410 homes at the top of a hill, in the heavy rainstorms we experience now.

2 The anti social behaviour in Littleham, at the Midway Estate and in Lower Littleham, has been a problem for at least 20 years and successive Police initiatives have never shifted it. It comes from a lack of youth facilities (which will affect new residents), and the housing of multiple sex offenders, problem families, ex offenders, and drug and prostitution concerns as well as the more ordinary theft, burglary and ASB offences which happen where there is a large council estate and insufficient police patrols due to over-extended and under-resourced local Police. Any new residents will be immediate burglary targets and the area is known for crime (this is confirmed by local crime figures; Littleham is consistently highest in the area). Patrols are very limited and Police are rarely seen here, as this Police Team is overstretched, particularly during school holidays.

3 There is already a town of 2,000 caravans meaning 50,000 families (an estimate) and their associated hundreds of thousands of car journeys, within a mile of the proposed development. The access to this town of Haven Devon Cliffs, is severely restricted to just one approach road, and the access, Littleham Road, has been kept crossing-free due to the high priority DCC and EDDC place upon this route. It brings millions of pounds to the local economy and is the largest Haven site in the country. This town exists between March and November every year and during winter, heavy plant uses the road constantly. This has barely been mentioned in the proposal and pre-pre-approval planning documents for Exmo_17 but the existence of this town, which I'll call Devon Cliffs, means the area is overpopulated already, with millions more car and lorry journeys than residents make.

It is desperately wrong to place yet another development (after Plumb Park, a very highly concentrated Estate at the top of the access road to Devon Cliffs) on the other side of the top of this access road. Effectively Salterton Road will become gridlocked in the summer as everyone tries to access or service Plumb Park, Devon Cliffs, the Midway Estate, Littleham village AND this proposed new site Exmo_17. It is a disastrous proposal.

4 There is serious underinvestment in the infrastructure of this area regarding waste water, resulting in the constant flooding of Lyme Bay with untreated sewage, especially in the winter, the rainy season. EDDC cannot hand this off to South West Water as it has been doing, as EDDC has full knowledge that SWW has no plans to build another treatment works, instead having placed a large outfall to the south, in the sea off Devon Cliffs. Effectively South West Water's solution, which its CEO and shareholders have supported instead of a new treatment works, is to send Exmouth's sewage to sea. This would be merely serious were it not for the reliance of local businesses, not least Devon Cliffs, on the visitor offer which requires clean beaches and a sea that can be safely bathed in by visitors.

EDDC is aware that over 1,000 people are involved in a class action lawsuit by Leigh Day for deprivation of recreation and business receipts due to the dumping of sewage at sea by South West Water and this action is ongoing. It is not a suitable place to add 410 homes which will inevitably load the sewage infrastructure to the point of further critical bursts, such as happened since Plumb Park was built. We can expect multiple bursts at various points along the ageing sewage infrastructure in Exmouth, each of the bursts in

the last 2 years has resulted in closing of the beach and large pollution incidents where the sea has been declared unfit for bathing. Adding 410 homes adjacent to Devon Cliffs and Plumb Park would be a further trigger, in respect to this.

5 The profit made by the landowner is the only reason this site has been put forward. The fields are successfully farmed by the same family, have been for decades and the farm is a going concern providing meat, dairy and arable. The landscape is under useful food production currently, fertile with high yield. Short-term profit is being set against priceless assets in a way which would be unthinkable until recently. The landowner does not care about anything but their own profit, they are certainly not considering residents, Devon Cliffs visitors, or the natural landscape they are supposed to be protecting for future generations. I believe their term is “stewarding” but this is evidently no longer the case.

6 Another factor is the protected status of the National Landscape (previously area of outstanding natural beauty) which relies on the its openness, undeveloped nature, varied and copious wildlife (including an active badger sett in the middle of the site, underneath the cycle path) and bird life, protected hedges, mature trees, and this beautiful prospect has so far been protected against all development by the protections a national landscape /AONB bestows. Those protections still exist or one might as well remove the NL designation from all such areas here. I note that Budleigh Salterton has retained its NL protections and coincidentally this is where the Business Manager of the landowner currently lives. I imagine that if he lived in Littleham, these fields would not be put forward as a site for development. Littleham has as much right to be protected as Budleigh or Sidmouth, it is all part of the National Landscape.

The Council has a statutory duty to “enhance” the “natural beauty” of the landscape. 410 houses cannot and will never do this, just the opposite.

If the site went ahead there would be two small “National Landscape” signs in the middle of a large housing estate, no different from the housing estates our visitors leave at home. They come here for the unspoilt rural nature of this place, if they find housing estates, they will not return. It removes at least 50% of the visitor offer to take away the green fields which give us rurality. It will change the character of this place from rural to suburban and there is no way, unless the houses were underground, that landscaping could “sensitively” mitigate the destruction of the openness, beauty and rurality of this site. Just because the landowner wants to sell his fields, does not mean they should be

sold. The landowner is merely trying to make money while house prices are high. The landowner has repeatedly stated they are a steward of East Devon's beautiful landscape and one wonders how this can be the case when their fields are being sold off for housing at a high rate.

7 EDDC has not made any attempt to negotiate-down the number of houses required by the Government given this area is covered in large part by National Landscape and sensitive areas. There is no attempt made to offer a lesser number of houses in order to have less effect on the landscape. 410 houses is a very large Estate, larger than Plumb Park, which is seen by many as overcrowded and badly planned in its aspects, The developer, Bloor in this case, has no motivation to keep prices low and there is no legal enforcement of the affordable homes target. Bloor could renege on all its pre-development promises and it would be a case of "too late, it's done" with no consequence to Bloor.

8 Bloor admits in its EIA report (25/0002/EIA) there are no dentists and not enough GPs to serve Exmouth as it currently stands, let alone if more residents are added. The one community college has class sizes more than the recommended size and outcomes are not the highest, with bullying and poor results, an ongoing concern for parents. To be honest the number of children may not be very high as the number of working families able to afford these houses will be very low. Plumb Park lowest prices were well over what local families could afford on the poor wages here. Most of the houses were bought as buy to let, second homes, or by retirees/incomers from the southeast. Bloor admits in its report (25/0002/EIA) that incomers will comprise most of the buyers of the proposed housing on Exmo_17.

9 I see that Exmo_17, has gone from being NOT allocated and NOT approved, merely a 2nd choice site for all the reasons I give, to a mysteriously pre-approved status, despite our local plan only being in draft form. I'm aware EDDC has arranged to buy out the Covenant with St Andrews Church which reserved the graveyard field within Exmo_17 for Diocese use, as a graveyard spill-over. Apparently this decision is already made! - Avoiding all democratic accountability and process. I am aware that other developments have taken a back seat and this site Exmo_17 has been virtually pre-approved by EDDC to the point where the role of the Strategic Planning committee may need scrutiny, as the proper democratic process appears to have been undermined, allowing proposals and applications for this site to proceed before the Local Plan has been finalised and with other sites still a possibility.

10 I wondered what was so special about this site Exmo-017 until I realised that having built upon it, the margin of built area will have been extended, paving the way for further development eastwards towards Quentance farm which is the landowner's stated, desired outcome. What we are looking at is the destruction, forever, of a large part of East Devon's National Landscape, a large reduction in the visitor offer, unacceptable infrastructure burden and a reduction in the quality of life for all residents, and particularly a reduction in the quality of the visitor offer for Haven Devon Cliffs customers who would prefer a holiday at a seaside location that isn't covered in dumped raw sewage.

11 The developer's request for EDDC to consider these multiple developments (Exmo_17 and Exmo_20) as stand-alone sites, sidesteps the disastrous effect that multiple large developments will have on Exmouth. The reports Bloor makes, only further Bloor's agenda. It makes no sense to treat Exmo_17 and Exmo_20 as stand-alone sites when the Govt targets are not separated but combined. If the Govt targets are, as stated, over 1,000 homes, the sites have to be considered as cumulative, as they are likely to be built close together in time, to satisfy those targets. In this respect and many others EDDC should view Bloor's representations with an appropriate filter, as Planning Potential (the agent) and Bloor are only acting for themselves/the landowner, and really don't care what happens to Exmouth as a whole, or its residents and visitors. Their reports and letters are a means to an end, ie profit, and should be viewed very carefully.

In summary: This site Exmo_17 should either remain undeveloped or be subject to a rigorous downward reappraisal where a few – a very few – select homes might be built which could be said to reflect the sensitivity of the area and which could blend with the landscape. 410 houses is hundreds too many, and right next to not just the Midway Estate, but to Devon Cliffs, a town of 2,000 multi-occupation caravans, inhabited by around 50,000 people, every year, using GPs, roads, buses, and filling the local supermarkets to capacity, and to which Bloor makes no reference, nor does EDDC make reference. The money made by Devon Cliffs and ploughed back into East Devon's economy, is well in excess of the money CDE would gain from this development.

My response to the proposal to build at Exmo_17 is that we already have Devon Cliffs here with thousands of people, which causes hundreds of thousands of journeys and millions of litres of sewage every year, we rely on our landscape to attract visitors and

populate that very busy town, and to serve those customers, so it would be a disaster to negatively affect these visitors and the local residents by the infliction of an overlarge development in an area known for its beauty, which won't even house local people. EDDC needs to look at other potential sites that are not so close to existing areas of stress on the infrastructure, character, visitor centres and rurality of this area. The visitor offer will be negatively affected by Exmo_17 and I'd like to ask Councillors to remember that they should, and are democratically required to, reflect the views of constituents in this matter. Due to the delicate nature of building on a National Landscape and the impossibility of returning the area to rurality, caution should be exercised, as 410 houses is an enormous burden to place on any landscape, and there are no mitigation measures which could successfully "enhance the natural beauty" of this area once 410 houses are placed upon it.

The development at Haven Devon Cliffs is tucked into a dip/bowl of land so the site is not seen from the main road, the village, or anywhere but the sea. This development, on the other hand, would be highly visible to all people and road travellers in the vicinity and cannot be mitigated due to its oversize. This is not a sensible or practical proposal especially considering its proximity to the Devon Cliffs site, which has first claim on the area's infrastructure and resources, and which requires a clean beach and rural location to maintain its customer base and visitor offer.

I reject the proposal to build at Exmo_17.

Full name: Rosie Fox

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- HONITON GROWTH - RESIDENTIAL
- I OBJECT to the proposed allocation Gitti_05.
- The reasons for this objection are summarised as follows:
 - Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advises a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
 - The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
 - Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
 - Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.

- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary schools are at capacity and is predicted to continue so;
- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

Full name: Rosie Fox

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Land West of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land it seems likely that the continuing development of high quality employment opportunities at Cranbrooke, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped.
- There are clearly existing viability issues in the area. If the site cannot come forward within the plan period for development then it should not be allocated.
- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a coalescence between Honiton and Gittisham village.
- The development will be highly visible, especially from elevated positions, and therefore detrimental to the setting of two designated National Landscapes (NL): formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation

- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha.
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark.
- The development would result in the loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

Raymond Franklin

Full name: Raymond Franklin

Other party name (if relevant): Judith Franklin

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of land at Exmo_20 is far from sound. We are very concerned that this allocation will have a seriously detrimental impact on the community of Budleigh Salterton and yet no Budleigh Salterton councillors were present at the strategic planning meeting where this allocation was approved. The councillors went against the recommendation of officers and failed to appreciate the devastating impact this huge urbanisation would have on the rural fringe of Budleigh Salterton. Ex_20 would threaten the tranquility, wildness and dark skies of the countryside which is contrary to Policy OL01. The proximity to the Pebblebed Heaths (SAC/SPA) is very worrying and is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy. EX_20 would endanger wildlife habitats and corridors, veteran trees and hedgerows. Issues of rainwater run off on this sloping site into the catchment area of Withycombe Brook on heavy clay are a great concern, especially to those with properties further down the water course and is in conflict with Policy AR01B. A particular concern is the inevitable increased traffic on the B3179 which is a busy road and far from safe. Access to the site from this location is an alarming prospect to the regular users of this route. Traffic congestion and parking is already a major problem in Exmouth and this sprawling urban expansion would exacerbate this. The elevation of this site above Exmouth town centre would make cycling or walking unlikely for many residents, making this site unsustainable. The impact of this allocation of land on the distinctly unique character of Budleigh Salterton, which is very different to that of Exmouth, would be disastrous and would lead to the coalescence of Budleigh and Exmouth contrary to Policy OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan, in accordance with the recommendations of planning officers. Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Simon Freeman

Full name: Simon Freeman

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:

I believe that the EDDC local planning authority have not fully considered previous submissions by residents of Cliff Road and surrounding roads concerning the possible effects of coastal erosion.

2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We believe that the collaboration work with the University of Plymouth is unsound. The research project assumed that there are no coastal defences in place and maintained. The authors of the report by the University do admit that predicting erosion of coasts is very complex and hence the anticipated erosion of the cliffs and adjoining land is very difficult to calculate.

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: We believe that the collaboration work with the University of Plymouth is unsound. The research project assumed that there are no coastal defences in place and maintained. The authors of the report by the University do admit that predicting erosion of coasts is very complex and hence the anticipated erosion of the cliffs and adjoining land is very difficult to calculate. The rates of erosion quoted in the report are greatly exaggerated. The Local Plan also proposes that no planning applications for modifications or

additional buildings should be permitted for residential properties in Cliff Road and surrounding roads. What is the reason for this proposal? Surely, providing that a planning application has been prepared in an acceptable format by a qualified person and that the design complies with the acceptable guidelines issued by Sidmouth Council, the onus should be on the person submitting the planning application to ensure that the property will be "safe". No one would submit a planning application for a building in a situation that would be in imminent danger of collapse due to cliff erosion! But the "life expectancy" of the houses on Cliff Road whose gardens back onto the sea would be at least 60 years from now.

3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Once the Sidmouth Beach Management Plan has been implemented and the additional gryones are in place, the CCMC should be deleted from the Local Plan.
2. EDDC should have a plan to actively monitor the coastal erosion of the cliffs in this area. This should provide accurate data on the erosion rate.
3. There should not be any restrictions on householders if they wish to modify existing buildings or add additional buildings in this area.

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Although the Local Plan is available on the EDDC web page, I am not sure whether this is sufficient, as the legislation states that all those people who may be affected by the Local Plan should be notified. How have those without internet connection been informed?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

James Gaisford

Full name: James Gaisford

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I have wish to bring to you attention Material Considerations in respect of the draft policy on Strategic Policy SD07: Development allocations at Broadclyst.

And in particular, my comments relate to Land west of Whimple Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29).

Infrastructure and Services

The current sewage arrangements do not cater for the village at the moment. In the period Floodmapper has records for, 2021-2023, raw sewage has been discharged in, or near (~3mi.), Broadclyst 178 time(s) and into the River Clyst. In addition the pumping station near Lowdens in the village spills multiple times a year. The proposed development would need to provide a solution to upgrade the capacity.

The GP Surgery is currently full and it has taken me two weeks to obtain an appointment. The proposed development would need to address how the extra residents would have access to healthcare.

The Junior school is also full and is unable to absorb any new Pupils

Environmental Considerations

The water table in the land under proposed development is very high and in the winter there is lying water on the ground. The proposed development would need to address where this water goes to.

Highway safety and transport.

There is a traffic logjam every day at the school and a pinch point on Station Road where it meets Slaparse lane. The road here is a single car wide and you have all the schoolchildren leaving Clyst Vale Community College. The development will need to take into account the increased traffic in this area and the safety of the children.

Susan Gallagher

Full name: Susan Gallagher

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I believe it is non compliant because it does not allow Axminster the opportunity to grow in a way that respects its history, environment, and community needs. It does not demonstrate or quantify that new developments are well-planned, environmentally responsible, and supported by the right infrastructure that creates a future that benefits both current and future generations. This is not a collaborative approach with a joined up plan — where residents, planners, and developers work together that would help achieve the best possible outcome for our town.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Transform this plan into a cohesive, data-driven strategy with clear baseline metrics and a well-defined infrastructure timeline that ensures: Axminster has a unique opportunity to grow in a way that honors its history, safeguards its environment, and meets the evolving needs of its community. To achieve this, new developments must be carefully planned, environmentally responsible, and supported by robust infrastructure from the outset. A well-structured approach—where housing, transport, public services, and utilities are developed in tandem—will create a sustainable future that benefits both current and future generations. By fostering collaboration between residents, planners, and developers, we can ensure that growth is not only well-managed but also enhances the town's

character and quality of life. A strategic, phased approach—guided by clear timelines and measurable outcomes—will deliver the best possible future for Axminster.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: see 2 above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: see 2 above

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: see 2 above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am passionate about ensuring that Axminster grows in a way that respects its rich history, protects its environment, and meets the evolving needs of its community. This can only be achieved through a well-coordinated, collaborative and strategic plan that integrates development with essential infrastructure and sustainability at its core.

Roger Gallagher

Full name: Roger Gallagher

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I believe it is non compliant because it does not allow Axminster the opportunity to grow in a way that respects its history, environment, and community needs. It does not demonstrate or quantify that new developments are well-planned, environmentally responsible, and supported by the right infrastructure that creates a future that benefits both current and future generations. This is not a collaborative approach with a joined up plan — where residents, planners, and developers work together that would help achieve the best possible outcome for our town.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Transform this plan into a cohesive, data-driven strategy with clear baseline metrics and a well-defined infrastructure timeline that ensures: Axminster has a unique opportunity to grow in a way that honors its history, safeguards its environment, and meets the evolving needs of its community. To achieve this, new developments must be carefully planned, environmentally responsible, and supported by robust infrastructure from the outset. A well-structured approach—where housing, transport, public services, and utilities are developed in tandem—will create a sustainable future that benefits both current and future generations. By fostering collaboration between residents, planners, and developers, we can ensure that growth is not only well-managed but also enhances the town's

character and quality of life. A strategic, phased approach—guided by clear timelines and measurable outcomes—will deliver the best possible future for Axminster.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

See my response to 2 above

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See my response to 2 above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See my response to 2 above

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See my response to 2 above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I am passionate about ensuring that Axminster grows in a way that respects its rich history, protects its environment, and meets the evolving needs of its community. This can only be achieved through a well-coordinated, collaborative and strategic plan that integrates development with essential infrastructure and sustainability at its core.

Joanne Gardiner

Full name: Joanne Gardiner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Objection to proposed development land Exmo_08 Objection to Proposed Development land Exmo_08 Littleham Fields between Elm Lane and Green Farm. My objection is because the Landscape and Ecology needs to be protected Highways, Access and movement are inadequate Flood Risk and Drainage is High and inadequate. I strongly object to the proposed development on Littleham fields as it will irreversable destroy the environment and have negative impact on local infrastructure and the wildlife in Littleham Village. The following points show why the building proposal on these fields at Littleham needs to be rejected.

- It would over develop a small Village recognised by Tourists as a holiday attraction
- The over development will have a negative impact on local amenities and soul and character of Littleham as well as negative impact on tourism jobs as people will opt to holiday elsewhere.
- Flooding o Additional houses, Road and Parking infrastructure will contribute to additional Surface Water. This will cause further complications to our current flood problems in Littleham. o Littleham River severely floods regularly every year closing Maer Lane by Green Farm and Prathayes Farm causing severe disruption to village life. This prevents traffic movement and emergency services reaching residents and access to Sandy Bay Holiday Park and Country Life Wildlife Park.
- Wildlife o Maer Valley is recognised as an area of outstanding beauty and these Littleham fields and river are part of it. There are rare butterflies, dragon flies that colonette. Countless Bird breeds, Water wading and hedge row birds. Local birds of prey - Owls, Buzzards, and Sparrow Hawks live and hunt here. Colonies of bats roost and fly over the Fields. There are Foxes, Deer and Badgers that frequent the valley fields. Development will disrupt the local eco system. Light Pollution o The additional homes and street lights will turn a dark Valley into a Xmas Tree disturbing the wildlife listed above and will cause to them to leave the area.

- Traffic/Transport o Additional homes will equate to additional cars, that will increase the risk of Safety and produce exhaust pollution and road congestion. The introduction of Plumb Park has increased traffic at Littleham Cross, and compounded the traffic flow and rate on Littleham Road, which is already passed breaking point in the Spring/Summer and Autumn seasons due to the 1000, s of cars travelling to and from Sandy Bay.
- Infrastructure o Water SWW Authority have had problems historically maintaining a regular high pressure to ensure no disruption to residential homes. During the Tourists season this drops severely and 2022 saw a near drought situation due to the record lack of rainfall causing our Exmouth feeding reservoirs to drop and nearly dry up. More Homes will cause standpipes to be issued. o Sewage SWWA have struggled to keep up with demand of Sewage capacity that builds up in the Summer due to increased residents in the Summer, particularly Littleham sewage works. Over the summer period sewage was expelled into our beaches during peak season. Additional Homes will add to this problem and this should be addressed prior. o Local Primary School COE Littleham, is already over capacity due to Plumb Park new 500+ Homes, and the planning for further 100's Homes cannot occur until this is addressed. o At the Littleham delicate Bridge by Clinton Arms – Littleham Road/West Down Road will not survive increased traffic and already had to be strengthened last year due to slumping. o Emergency Services – Additional pressure on a stretched Police and Fire Services having to service Sandy Bay and the additional new Plumb Park Residents. Adding further Homes just exacerbates the situation o Health Care/Hospitals – already over subscribed
- Tourism o Tourists come to Littleham and Exmouth to enjoy the Open Green space. Filling all the available green patches of land with housing and roads will turn Littleham into a large Housing Estate and lose the countryside element.
- Communities Farming o Devon needs its farmland for growing and harvesting crops and feeding cattle and sheep on its land. This was demonstrated and been encouraged for farmers to grow crops again to get Britain to be more self-efficient highlighted by the recent Ukraine War and covid pandemic. We must not build on our Farm land that these fields have been used for generations of farmers and used by the local Littleham Farm 'Green Farm'
- Green land o all built on and communities, parishes being joined together and losing their identity no gaps in housing and no strips or designated green areas deemed for not developing on. Our Homes are built on Brown reused land formerly a Primary school carpark. The proposal identified utilises Green Land not brown or Grey land.
- Disruption – Noise/Dirt/Congestion/Pollution o Major disruption has occurred by the large-scale development of Plumb Park and Pankhurst building developments. There has been damage to the road infrastructure – potholes and surface road subsidence

due to increased traffic and heavy building vehicle. o Due to the steep sloping gradient of the field between Elm Lane and Green Farm, it will require artificial banking this will cause the houses to be elevated blocking the natural sun light enjoyed by the residents creating shadows. All will create more flooding which needs to be addressed as a priority. I object to all developments on these fields .

Lindsay Gardiner

Full name: Lindsay Gardiner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Objection to proposed development land Exmo_08

Objection to Proposed Development land Exmo_08 Littleham Fields between Elm Lane and Green Farm.

My objective is because the Landscape and Ecology needs to be protected

Highways, Access and movement are inadequate

Flood Risk and Drainage is High and inadequate.

I strongly object to the proposed development on Littleham fields as it will irreversable destroy the environment and have negative impact on local infrastructure and the wildlife in Littleham Village.

The following points show why the building proposal on these fields at Littleham needs to be rejected.

- It would over develop a small Village recognised by Tourists as a holiday attraction

- The over development will have a negative impact on local amenities and soul and character of Littleham as well as negative impact on tourism jobs as people will opt to holiday elsewhere.

- Flooding

- o Additional houses, Road and Parking infrastructure will contribute to additional Surface Water. This will cause further complications to our current flood problems in Littleham.

- o Littleham River severely floods regularly every year closing Maer Lane by Green Farm and Prathayes Farm causing severe disruption to village life. This prevents traffic movement and emergency services reaching residents and access to Sandy Bay Holiday Park and Country Life Wildlife Park.

- Wildlife

- o Maer Valley is recognised as an area of outstanding beauty and these Littleham fields and river are part of it. There are rare butterflies, dragon flies that colonette. Countless Bird breeds, Water wading and hedge row birds. Local birds of prey -Owls, Buzzards, and Sparrow Hawks live and hunt here.

Colonies of bats roost and fly over the Fields. There are Foxes, Deer and Badgers that frequent the valley fields. Development will disrupt the local eco system.

Light Pollution

o The additional homes and street lights will turn a dark Valley into a Xmas Tree disturbing the wildlife listed above and will cause to them to leave the area.

- Traffic/Transport

o Additional homes will equate to additional cars, that will increase the risk of Safety and produce exhaust pollution and road congestion. The introduction of Plumb Park has increased traffic at Littleham Cross, and compounded the traffic flow and rate on Littleham Road, which is already passed breaking point in the Spring/Summer and Autumn seasons due to the 1000's of cars travelling to and from Sandy Bay.

- Infrastructure

o Water SWW Authority have had problems historically maintaining a regular high pressure to ensure no disruption to residential homes. During the Tourists season this drops severely and 2022 saw a near drought situation due to the record lack of rainfall causing our Exmouth feeding reservoirs to drop and nearly dry up. More Homes will cause standpipes to be issued.

o Sewage SWWA have struggled to keep up with demand of Sewage capacity that builds up in the Summer due to increased residents in the Summer, particularly Littleham sewage works. Over the summer period sewage was expelled into our beaches during peak season. Additional Homes will add to this problem and this should be addressed prior.

o Local Primary School COE Littleham, is already over capacity due to Plumb Park new 500+ Homes, and the planning for further 100's Homes cannot occur until this is addressed.

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- o At the Littleham delicate Bridge by Clinton Arms – Littleham Road/West Down Road will not survive increased traffic and already had to be strengthened last year due to slumping.

- o Emergency Services – Additional pressure on a stretched Police and Fire Services having to service Sandy Bay and the additional new Plumb Park Residents. Adding further Homes just exacerbates the situation

- o Health Care/Hospitals – already over subscribed

- Tourism

- o Tourists come to Littleham and Exmouth to enjoy the Open Green space. Filling all the available green patches of land with housing and roads will turn Littleham into a large Housing Estate and lose the countryside element.

- Communities Farming

- o Devon needs its farmland for growing and harvesting crops and feeding cattle and sheep on its land. This has been demonstrated and been encouraged for farmers to grow crops again to get Britain to be more self-efficient highlighted by the recent Ukraine War and covid pandemic. We must not build on our Farm land that these fields have been used for generations of farmers and used by the local Littleham Farm 'Green Farm'

- Green land

- o all built on and communities, parishes being joined together and losing their identity no gaps in housing and no strips or designated green areas deemed for not developing

on. Our Homes are built on Brown reused land formerly a Primary school carpark. The proposal identified utilises Green Land not brown or Grey land.

- Disruption – Noise/Dirt/Congestion/Pylon's

- o Major disruption has occurred by the large-scale development of Plumb Park and Pankhurst building developments. There has been damage to the road infrastructure – potholes and surface road subsidence due to increased traffic and heavy building vehicle.

- o Due to the steep sloping gradient of the field between Elm Lane and Green Farm, it will require artificial banking this will cause the houses to be elevated blocking the natural sun light enjoyed by the residents creating shadows.

All will create more flooding which needs to be addressed as a priority.

I object to all developments on these fields .

Sabra Gardner

Full name: Sabra Gardner

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed Allocation of sites – specifically Axmi_02, 08, 09

1.Flooding. My comments relate to this section of the proposal (Axmi_02) -and the adjoining Axmi_08 and Axmi_09. The public footpath known as Fairy Lane forms part of the heritage Fosseway. As a path leading from the fields to Musbury Road - during periods of heavy rainfall this path becomes a torrent of water. A drain cover is installed at the junction of Fairy Lane and Musbury Rd - however this is often covered in debris and therefore insufficient to handle the quantities of water. There is no other drainage in the area for surface water collection. What is not apparent from a 2D map is the gradient of the land and how much higher the fields are than the houses. Therefore - the water flows directly over the road and floods the houses opposite our property which are at a lower level than the road – as well as flowing down the road. In periods of cold weather, this then freezes becoming a significant hazard.

With the current drainage systems unable to deal with current rainfall events - if the fields were to become a housing development - reducing natural drainage into the

ground - flooding events would significantly increase causing devastation to households - both financial and practical. This could also impact the nutrient neutrality in the area. Excess water drainage due to concreting over the fields would increase nutrient pollution, causing potentially disastrous effects on water quality, the environment & biodiversity.

2. SWW Inadequate infrastructure. South West Water (SWW) have attended multiple times over the last few years - sometimes for planned works but often for emergency reasons. However the issues with poor drainage / sewerage facilities servicing our property and our neighbours continues. They have dug up the road outside our property multiple times, each time apparently repairing or reviewing the dated infrastructure - but issues continue. I am awaiting info from SWW – but these are just some of the visits – Oct 3rd & 15th 2018, July 2021, Significant issues Oct 2021, 6th Dec 2022, 31st July 2024, (closing road suddenly). Another leak issue occurred in Lear Lane on 20th Sept 2024– with SWW returning again on 11th Oct as still leaking – yet another reminder of failure of infrastructure / old pipes. Myself & neighbours report numerous occasions when there has been high rainfall and consequently flooding. Indeed in October 2021 due to massive flooding, they have had to pay for drain clearance / installation in their driveways and have sandbags at the ready.

With the current SWW network totally inadequate for the current housing on this section of Musbury Road - it would be a catastrophe to add any further development to this system.

3. Road Safety. At this section of Musbury Road, the road is narrow, on the brow of a hill (as our house name suggests) with no footpaths either side. The speed limit of 30mph is not adhered to and as one of the main road and bus routes into Axminster – it is already a hazard for safety - not only for any cars trying to exit their driveways / houses - but also no pedestrian access down the road. Often, people have to take their lives in their

hands to attempt to ‘bunny hop’ from one drive to another in an attempt to navigate this section of road. The road at this section is barely wide enough for 2 cars, and when buses or lorries use this, there is absolutely no margin for manoeuvre – especially if a motorist was to come across a pedestrian having to walk along the road.

As will be noted, most properties have had to instal multiple mirrors to aid access in and out - so I cannot see how safe access would be provided not only for any housing development - but also for contractors during building. To emphasise the safety issues, I have detailed some serious accidents just on this section of Musbury Road – 19/8/13, 10/8/17, 20/10/17, 15/6/18, 26/8/22, 3/11/22, 15/3/24. Limited visibility at this section of road would negate any access around the Fairy Lane site and there is no possibility of widening the road due to the housing on either side.

A potential access could be Woodbury Park / Wyke Road - however these are also extremely narrow roads with current housing developments limiting widening of these roads - so safe and accessible routes in and out of the proposed sites is not viable.

5/8/2016 –Axminster Neighbourhood plan – The summary stated “there is consistency across the County, District and Parish that a relief road is necessary as the only way of reducing the problems in the town centre”. Obviously – this was not undertaken when the last developments were planned and built – so if this was necessary then – how would the town cope with additional proposed housing?

4.Access to Facilities. Access to facilities in the town (ever dwindling) and through the town via A358 is already extremely congested due to the nature of the narrow roads and old buildings - so again if there was a huge increase in numbers of people accessing the town and trying to park, drive from one side to another - the current infrastructure is totally unsuitable. Another consideration would be the lack of pedestrian access from this area of Musbury Road into the town centre. Should additional homes be built on these fields, how would climate friendly pedestrian / bicycle access from these developments into the town centre be managed ?

5. Archeological interest. Archeological remains were recently found within the proposed site, with a nearby Scheduled Ancient Monument - what investigations would be conducted regarding these archeological sites to safeguard these areas of archeological / historical significance?

6. I have recently taken part in the Devon Bat Survey - which found a number of bat species around my property with the Western Barbastelle found (as a 99% probability) a rare and threatened species. I would enquire as to what environmental / species investigations will be conducted to ensure that wildlife and particularly endangered species are not further harmed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Flooding risk would need to be addressed as well as nutrient neutrality due to the proximity of the River Axe. Provision to take water away from Musbury Road as per the current gradient would need to be provided.

2. South West Water infrastructure is required to be completely installed - new drainage and water facilities to protect land and current housing - never mind the additional 1409 proposed .

3. Road safety is currently an issue - so provision of access for construction as well as house holders on the proposed site would need to be separate from current Musbury Road. There needs to be additional relief road for large lorries which would affect road safety around Axminster. This was seen as necessary in 2016 but has still not been built! Public right of way and bicycle paths should be installed to allow for safe sustainable travel from the proposed site to the Axminster town centre. There needs to be thought about how people would access the opposite side of the town centre as the current High Street would not suffice.

4. Access to facilities in town centre is already congested - so new relief road to access these would be necessary - as well as planning for new schools, medical facilities to cater for 1409 new households.

5. The proposed areas Axmi_02, Axmi_08, Axmi_09 should be removed from the Plan as the potential for further flooding due to land gradient and South West Water inadequate infrastructure, road safety and access to site and Town Centre concerns are too severe.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I don't believe that this policy complies with a duty to cooperate as no consideration has been given to alleviate the current flooding, road access and safety concerns.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I feel that the considerations of the Land owners currently outweighs the significant concerns of the local community as we have put forward valid concerns which have not been taken into account when preparing the Local Plan.

susan gebbie

Full name: susan gebbie

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD08

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
harm to pebblebeds, heritage, countryside and wildlife, infrastructure of local amenities such as schools and doctors insufficient, swereage and water not sufficiently robust

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

DIANE GEE

Full name: DIANE GEE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than to Exmouth, making Budleigh its most convenient town. The services and infrastructure of Budleigh (High Street, doctors, school, beach, etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan. Current local residents find it impossible at times even in winter to park for services and shopping and in the summer the roads are already highly congested. Exmo_20 would greatly increase the numbers of cars needed for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The narrow country roads would not support such a large concentrated volume of extra traffic. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01b. The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. The Pebblebed Lowland Heaths are internationally recognised as being of importance. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations Assessment (30.01.25)

confirms that there is currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. Exmo_20 would destroy the tranquillity, wildness and dark skies of the countryside, which is contrary to POLICY OL01. Exmo_20 would have significant adverse effects on St John in the Wilderness Grade 2* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo 20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jackie Gennesy

Full name: Jackie Gennesy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: There should be no development on National Landscape land Type of houses proposed not suitable for Exmouth requirements

Richard George

Full name: Richard George

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The mail access point of Exmo_20 is significantly closer to Budleigh than Exmouth, making Budleigh it's most significant town. The services and infrastructure of Budleigh would be the preferred choice for new Exmo_20 residents. This would lead to a coalescence of Budleigh and Exmouth undermining the settlement hierarchy, contrary to POLICY05. Before any further developments are undertaken in the East Devon area, there must be in place, sufficient Doctor Surgeries, Primary and Secondary Schools, improved roads, a complete overhaul and upgrade of the sewerage and water systems and services. Electrical and internet supply. Any development that's then undertaken, there must be written into the plans that ALL houses are build with solar panels in place and each property has a water catchment to be used for toilets, washing etc.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan or Reduce the size of Exmo_20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jane Gething

Full name: Jane Gething

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I do not know.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The planning officers recommended that the site should not be allocated due to the following points: No convenient pedestrian access to services and facilities in the village- the roads are very narrow, there are no pavements and no streetlights. This site is part of the green wedge, which should divide Whimble and Cranbrook- building on Whim_08a could lead to the two settlements becoming joined. There will be an impact on the rural landscape and wildlife sites. There is a risk of flooding in the area, which would be exacerbated by an increase in non-permeable surfaces such as roads, roofs, car parking areas etc.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not develop this site.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The transport connections do not support an increase in

homes due to the narrow, dangerous road plus the lack of bus services and a reduction in the number of train stops. I do not believe that the village needs 83 new homes based on the housing needs survey. I do not feel that the environmental protection has been thoroughly thought through with the risk of flooding and the loss of wildlife sites. The infrastructure cannot cope with development of this size due to the narrow roads, small village primary school, lack of safe parking and the lack of car parking. It would be unsafe for the pupils to walk to the outside facility (MUGA) for PE lessons with an increase in traffic on the roads and more cars parked.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Alison Gibbings

Full name: Alison Gibbings

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Final week to 'Have your say' about proposed housing schemes in Exmouth. Do you want to stop building on a protected 'area of outstanding natural beauty' (now renamed National Landscape) on the eastern edge of Exmouth? This is an area the size of 4 football fields that stretches from opposite McDonalds right down to Castle Lane with industrial units next to Salterton Road plus 410-450 houses. There would be one access road with one exit onto Salterton Road. The access road would go straight across the old railway line which is now a well-used wide cycle and I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and

wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Colin William Gibbins

Full name: Colin William Gibbins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: I don't have the knowledge to answer the above.

But I understand Residents of Feniton were not taken into consideration as Common Place was not used.

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: EDDCs preferred use of Common Place is very confusing and as a member of the public I wish to

comment but find this impossible to do so. I consider this is not right to make me unable to comment by this method.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- It's well documented that Feniton regularly floods.

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.
- Volume of traffic in our narrow single track roads is unsustainable

Sewage:

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one

with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.

- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time
- to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

4 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan sound, in respect of any soundness matters you have identified at 5(b) above. You will need to say why each modification will make this part of the East

Devon Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible. (Continue on a separate sheet if necessary)

If the whole draft local plan is rejected, the whole of East Devon, including Feniton could be imposed with far greater development than has been suggested. Therefore suggestions for this section are:

To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

With all the pressure from the Government to do away with Farming in the UK I will do my utmost to protect our family farm.

I have worked our land in Feniton for some 70 years, along with three generations before me. We have a huge population in the UK who need food, farmers produce food.

The most important thing is food security in these uncertain times with Europe and beyond

To lose one of the best fields to housing is so detrimental due to the lack of understanding that the village is accessed along narrow roads, the whole area of East Devon suffers overloaded schools, medical services, sewerage, water run off as many others comment on each development that is proposed.

Feniton is not the place for new housing. The site beyond the Sports Field should be completed and that be the end of it.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Hannah Gibbons

Full name: Hannah Gibbons

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL04

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: Yes

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: OL04 Areas of strategic visual importance: (What is the point in designating coastal preservation areas if you then hold consultations about removing parts of the area and then ignore public consultee responses? e.g. what happened at EXMO17. It makes the whole designation pointless. What is to stop the boundary from being changed again? It therefore affords no real protection.)

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Hannah Gibbons

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: National planning policy framework. Para 190 p55. ,When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁷ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and (Clinton Devon own plenty of other land outside of the National Landscape which could be considered) c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. (Proposed plan to put a road across the cycle path - therefore changing the nature of the path and safe access to all users, increasing risk of injury, reduction in value of an actual designated no vehicle space and therefore the enjoyment of all users)

Government Policy paper 30by30 on land in England: confirmed criteria and next steps
Oct 24

“Protected landscapes will be able to make a contribution to meeting our international commitment to protect 30% of land for biodiversity by 2030, as well as our Environmental Act targets to halt and then reverse the decline in nature.”

“Areas contributing towards 30by30 (30by30 areas) will include land within and beyond Protected Areas. These areas should be well-connected with each other and with the

wider landscape, and should represent the range of wildlife-rich habitats and important species found in England. They will form the core of the Nature Recovery Network, our growing national network of wildlife-rich places, stretching from our cities to countryside, mountains to coast. This should include significant areas of our Protected Landscapes (National Parks, National Landscapes and the Broads), which contain around half of England's priority habitats. We can, and must, go further within Protected Landscapes than other areas to meet our national environmental targets, including 30by30."

OL01: Landscape features "Development would only be permitted where it would not harm the environmental qualities ... including, C) Adverse disruption of a view from a public place... D) aesthetic and perceptual factors such as tranquillity, wildness and dark skies" The current cycle path through the Littleham area provides both tranquillity and wildness which would be lost by the introduction of the proposed EXMO17 development, in particular by putting a road across it and the introduction of hundreds of houses and therefore noise and destruction that comes with that number of subsequent people. In addition the development site can be clearly seen from the SW coastpath at the trigpoint adjacent to East Devon Golf Course as well as the cycle path which passes through the proposed development area.

Emerging plan policy OL02: "The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon: A. Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant);; B. Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest; and East Devon Local Plan 2020 to 2042 –Regulation 19 Plan – February 2025 200 C. Any relevant National Landscape Management Plans will be a material consideration in decision making. This policy will also apply to the Heritage Coast. This policy applies across the whole plan area including the Cranbrook Plan area" How is it possible for a development of over 400 houses to meet criteria A? The term exceptional circumstances is vague and I don't believe that the current housing 'need' is exceptional enough particularly when there are other potential development areas e.g to the north of Salterton Road (this land falls within the same tenancy as the land at Exmo17.

Developing at EXMO17 would give a precedent and would open up the NL to further significant development in the future.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO17 from the local plan

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

National planning policy framework. Para 190 p55. ,When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁷ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and (Clinton Devon own plenty of other land outside of the National Landscape which could be considered) c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. (Proposed plan to put a road across the cycle path - therefore changing the nature of the path and safe access to all users, increasing risk of injury, reduction in value of an actual designated no vehicle space and therefore the enjoyment of all users)

Government Policy paper 30by30 on land in England: confirmed criteria and next steps
Oct 24

“Protected landscapes will be able to make a contribution to meeting our international commitment to protect 30% of land for biodiversity by 2030, as well as our Environmental Act targets to halt and then reverse the decline in nature.”

“Areas contributing towards 30by30 (30by30 areas) will include land within and beyond Protected Areas. These areas should be well-connected with each other and with the wider landscape, and should represent the range of wildlife-rich habitats and important species found in England. They will form the core of the Nature Recovery Network, our growing national network of wildlife-rich places, stretching from our cities to

countryside, mountains to coast. This should include significant areas of our Protected Landscapes (National Parks, National Landscapes and the Broads), which contain around half of England's priority habitats. We can, and must, go further within Protected Landscapes than other areas to meet our national environmental targets, including 30by30."

OL01: Landscape features "Development would only be permitted where it would not harm the environmental qualities ... including, C) Adverse disruption of a view from a public place... D) aesthetic and perceptual factors such as tranquillity, wildness and dark skies" The current cycle path through the Littleham area provides both tranquillity and wildness which would be lost by the introduction of the proposed EXMO17 development, in particular by putting a road across it and the introduction of hundreds of houses and therefore noise and destruction that comes with that number of subsequent people. In addition the development site can be clearly seen from the SW coastpath at the trigpoint adjacent to East Devon Golf Course as well as the cycle path which passes through the proposed development area.

Emerging plan policy OL02: "The highest level of protection will be given to the landscape and scenic beauty of the National Landscapes (NL's) in East Devon: A. Development in a NL, or outside but affecting its setting or appearance, will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL (including the coastline, where relevant);; B. Major development in a NL will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest; and East Devon Local Plan 2020 to 2042 –Regulation 19 Plan – February 2025 200 C. Any relevant National Landscape Management Plans will be a material consideration in decision making. This policy will also apply to the Heritage Coast. This policy applies across the whole plan area including the Cranbrook Plan area" How is it possible for a development of over 400 houses to meet criteria A? The term exceptional circumstances is vague and I don't believe that the current housing 'need' is exceptional enough particularly when there are other potential development areas e.g to the north of Salterton Road (this land falls within the same tenancy as the land at Exmo17.

Developing at EXMO17 would give a precedent and would open up the NL to further significant development in the future.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo17 from the local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Roger Gibson

Full name: Roger Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I believe that the proposed development of site EXMO_17, which by its very nature will mean an extension of Exmouth eastward on the currently undeveloped East Devon National Landscape (formerly AONB) towards Budleigh Salterton. Inclusion of EXMO_17 in the East Devon District Council Local Plan fundamentally fails the "Consistent with national policy" soundness test due to severe conflicts with statutory protections, national planning policy, and local policy obligations.

1. Direct Conflict with National Planning Policy Framework (NPPF) The National Planning Policy Framework (NPPF) provides unequivocal legal protection for National Landscapes: Paragraph 176: The highest level of protection must be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Development should be strictly limited in these areas. The proposed extension fundamentally contradicts this principle, as it represents large-scale urban encroachment into a protected landscape. Paragraph 177: Major development in a National Landscape should be refused unless it passes exceptional circumstances tests and is in the public interest. This proposal fails every test: No overriding need: Housing or economic growth objectives do not constitute exceptional circumstances, particularly when alternative sites exist outside protected areas. Alternative locations exist: Other areas within East Devon can accommodate growth without violating protected land status. Severe environmental and landscape harm: The development irreversibly damages the area's ecological integrity, scenic character, and ecosystem services. Legal Precedent: High Court rulings have consistently upheld AONB/National Landscape protections, ruling that "economic development" or "housing targets" do not override statutory protection. The approval of this proposal would invite an immediate legal challenge.

2. Breach of Statutory Duty Under the Countryside and Rights of Way Act 2000 (CROW Act, Section 85) Section 85 of the CROW Act places a mandatory legal duty on public authorities to conserve and enhance the natural beauty of National Landscapes. Any decision that fails to give "great weight" to protection is unlawful. By approving this

proposal, East Devon District Council would be in breach of this duty, making the plan legally indefensible and subject to judicial review.

3. Direct Contradiction of the East Devon Local Plan and Policy Framework The proposed extension also fails to comply with East Devon's own planning policies, making it internally inconsistent and thus unsound: Strategy 46: Landscape Conservation and Enhancement and AONBs Requires that development must enhance, not harm, the special qualities of National Landscapes. The proposal would cause irreversible harm, violating this policy outright. Policy D1: Design and Local Distinctiveness Development must respect and protect local landscape character. The urban expansion into protected countryside undermines the distinctive rural and coastal identity of Budleigh Salterton and its surroundings. Urban Sprawl Prevention & Settlement Separation The merging of Exmouth and Budleigh Salterton is a serious planning concern. National and local policy explicitly protect the distinctiveness of settlements, ensuring they are not lost to uncontrolled expansion.

4. Environmental Destruction and Irreversible Harm The East Devon National Landscape is one of the most ecologically valuable and visually iconic landscapes in the UK. Development would result in: Biodiversity loss: This area hosts legally protected species and priority habitats under the Wildlife and Countryside Act 1981 and the UK Biodiversity Action Plan. Destruction of irreplaceable ecosystems: The undeveloped land acts as a natural carbon sink, floodplain, and wildlife corridor. Increased climate risk: Removing these natural defences increases flood risk, reduces climate resilience, and worsens ecological degradation.

5. Legal Risk of Judicial Review and Government Intervention This proposal is legally indefensible. If included in the Local Plan: It is highly likely to be legally challenged under the CROW Act and NPPF non-compliance. Past judicial reviews have struck down developments in National Landscapes where local authorities failed to provide a lawful justification. Conclusion: The Local Plan is Unsound and Legally Indefensible This proposal directly contradicts national policy, breaches statutory duties, violates East Devon's own Local Plan, and would likely be overturned in court.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To remain legally compliant, policy-

consistent, and defensible, East Devon District Council must exclude this proposal from the Local Plan.

Stated that EDDC should not pursue development in EXMO_17 because they would breach planning law and ultimately would end up in years of litigation and that only Government had the power to change planning law, not EDDC. Or words to

Scott Gibson

Full name: Scott Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: && Exmo_20 is too near to the Pebblebed Heaths. Your Policy PB01 does not allow this development as this location will cause harm to the Heaths.

&& Dark skies, tranquility and wilderness, as per Policy OL01, will be wrecked by all the housing of Exmo_20 beside Woodbury Common.

&& Wildlife corridor destruction and habitat fragmentation on our Pebblebed Heaths would occur with Exmo_20, contrary to Paragraph 13.23.

&& Paragraph 13.9 would be confounded by Exmo_20 because of the disturbance to irreplaceable habitats and species-rich hedgerows. What about the lovely Dartford Warblers on Woodbury Common?

&& St John in the Wilderness is “listed” and will lose its serene tranquility due to Exmo_20, affecting worshippers and visitors to the graveyard. Policy HE02 will be confounded.

&& There WILL be much more car use with Exmo_20, causing more congestion and fumes, conflicting with Paragraph 11.2.

&& There will NOT be much use of bikes as you think because Exmo_20 is way uphill from the towns Exmouth and Budleigh. This is against your Policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stand up to the government and refuse their extra housing demands!

Full name: Scott Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 will create extra drainage & sewage problems because of the 700+ houses and associated impervious roads, paths, roofs etc. Soakaways won't work due to the clay subsoil. SWWA can't cope with the present population of Exmouth, with many illegal sewage dumps into the sea last year. Policy AR01B is contravened because you will flood Exmouth! You may be able to build the huge extra sewage and drainage pipes needed but SWWA won't be able to process this extra effluent, will they?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Scrap Exmo_20 altogether

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Martin Gibson

Full name: Martin Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: && There's serious risk of flooding down to the lower-lying town of Exmouth. Exmo_20 site has clay under soil meaning it's poor at absorbing water, so encouraging run off during storms. If you ignore your own Policy AR01B and cover this with roads, paths, roofs and hard standing aprons, you will further increase run-off. No doubt you will say that this can be accommodated by installing drains.... but where will these drains go? Probably into the sea, along with sewage. Don't tell me this can't happen - it already happened last year, spoiling people's health, their enjoyment of the beach and the holiday trade. SWWA will never have the funds to cope with the extra 700+ houses in your development. Nature is powerful - cast your mind back to 1960 and Withycombe Brook.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: # Exmo-20 entrance on B3179 is nearer to Budleigh than Exmouth. Contrary to Policy OL05, this would effectively merge these two towns.

Policy TR01 is contravened because it's too steep and too far to cycle or walk from Budleigh or Exmouth. It's also isolated from services by being over 800m away, contrary to Para 11.6. Car use would be essential, contrary to Para 11.2 with fumes and congestion. It's unsustainable development!

Exmo_20 is on poorly draining clay soil, uphill from Exmouth, so heavy rain water will not soak away but cascade down causing flooding. Remember 1960? How about the sewage discharges of 2024? So the drains can't cope at present, let alone in the future, even with the minuscule improvements which SWWA have promised. This makes a mockery of Policy AR01B.

St John is presently in the Wilderness. Not for much longer if you go ahead with this awful Exmo_20 bricks and concrete scheme. It's a listed site, deserving tranquility as per your Policy HE02

There's a whole raft of reasons why Exmo_20 should not be so near to the ecologically fragile Pebblebed Heaths. Policies PB01, OL01, OL09, PB04 are contravened, along with Paragraphs 13.9 and 13.23.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Scrap Exmo-20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Thelma Gibson

Full name: Thelma Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Full name: Thelma Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: #

Flood risk for Exmo_20 Uphill from Exmouth. Impervious clay soil encourages run off and flooding. Big problems already in 2024 and 1960. SWWA are useless. Conflict with policy AR01B.

bike travel Exmo_20 not likely due to being uphill from Budleigh and Exmouth, contrary to Policy TR01. So more car travel with fumes and congestion contrary to Para 11.2. More than 800m from services, contrary to Para11.6

St John will no longer be in the WILDERNESS, being surrounded with concrete due to Exmo_20. This tranquil, listed location will be spoiled, contrary to Policy HE02.

Exmo_20 is too close to pebble bed heath of Woodbury Common with its irreplaceable habitats, trees and fragile species and corridors for wildlife, contravening Paragraphs 13.23 and 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Scrap Exmo_20

Full name: Thelma Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

....Exmo_20 is too close to Woodbury Common with its Dartford Warblers and other fragile flora and fauna. This is against Policy PB01

.... Exmo_20 will effectively merge Exmouth with Budleigh, against Policy OL05.

.... Exmo_20 is uphill from Exmouth (and Budleigh) and you won't get many people cycling! They will use their cars (against Policy TR01) More pollution! They will be over 800metres from services, which mitigates against Paragraph 11.6

.... SWWA can't cope with existing floodwater. Imagine how much another 700+ houses would add to this risk with soak-away drains being useless in the heavy clay soil of this area. Exmo_20 is uphill from Exmouth. Policy AR01B is conflicted.

..... St John in the Wilderness will be boxed in with incongruous development, wrecking its tranquil character and disobeying Policy HE02.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: # Local Plan Policy OL05 is contravened by effectively merging Exmouth and Budleigh. Exmo_20 residents would be nearer to Budleigh than Exmouth re services such as doctors, shops, schools

Exmo_20 is more than half mile away from facilities and services, so Para 11.6 is contravened.

More traffic congestion would occur with Exmo_20 because car travel would be essential - this contravenes Para 11.2.

This site, Exmo_20, is a long way UPHILL from Exmouth (or Budleigh), so bike or walking is unlikely and makes nonsense of Policy TR01.

Have you forgotten 1960 when Withycombe Brook flooded? Have you forgotten the tremendous sewage & drainage problems of last year? EXMO-20 is at high altitude, with impervious subsoil, so there's flood risk lower down in Exmouth, contravening Police AR01B. This is exacerbated by concrete roads and driveways and waterproof roof tiles - where is the water going to drain?

St John in the WILDERNESS would be that in name only. Exmo_20 would surround this tranquil area with incongruous development, totally wrecking the environs of this listed churchyard and disregards Policy HE02.

Policy OL01 would encourage the countryside to have TRANQUILITY, WILDNESS and DARK SKIES. Exmo_20 does the exact opposite.

Wildlife corridors and habitats, ancient trees , hedgerows -some irreplaceable - would be wrecked by Exmo_20 due to fragmentation, noise, pollution and disturbance. This goes against Paras 13.9 and 13.23 of Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: scrap Exmo_20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Martin Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Covering this large clay soil area with roofs, concrete drives, paths and roads will cause big sewage and drainage problems. Remember that Exmouth has frequent sewage spills into the sea causing mayhem for beach users, loss of holiday trade etc. Exmouth can't cope at the moment and It will cost a FORTUNE to bring it up to acceptable present standards, let alone standards to cope with so much extra development. Do you recall the Withycombe Brook flood in 1960?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Abandon EXMO-20

Full name: Martin Gibson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is a comprehensive development scheme in a rural area of East Devon. It is by no means a modest development. It's a rape of what is currently open countryside and conflicts with your para 2.6.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 altogether. If that is not possible, reduce its size to 20%.

Rebecca Giffard

Full name: Rebecca Giffard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: As I do not have legal training, I am unable to confirm that it is or is not legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of land Whim_08a is not sound for numerous reasons:

1. The site forms part of the Green Wedge. The EDDC Emerging Local Plan Policy OL05 states that development should not be allowed on Green Wedges if it "damages the individual character or identity of a settlement or could lead to or encourage settlement coalescence,". Building on Whim_08a would therefore be in breach of this policy in two ways. Firstly, it is likely that building here would lead to coalescence with Cranbrook due to the geographical closeness of the Cobdens development. Secondly, this in turn would lead to Whimple and in particular the Bramley Gardens area of the village, losing its individual identity and becoming part of the suburban sprawling spreading east of Exeter.

2. The proposed developed is incompatible with spatial strategy. The EDDC Site Allocation Report states that "Whimble is a 'Tier 4' settlement, were the draft local plan seeks to promote limited development to meet local needs". A recent Housing Needs Survey commissioned by Whimble PC identified the need for 4 affordable homes within the next 5 years. The proposed developments of Whim_11 or Whim_08a individually are excessively beyond the locally identified need. In addition, the development at the Cobdens of 1500 houses which falls within Whimble Parish Area meeting (and exceeding) the identified need of 4 houses. No more are needed within the village.

3. The site lacks safe and convenient pedestrian to the village. Access is onto Church Road which is narrow yet extremely busy especially during peak times such as 9am and 3.30pm for the school run. The Police have confirmed that Church Road is not recommended as a safe route to the Primary School, village shop, church or train station. The building of any more homes in the village will only add to this hazard.

4. The allocation of Whim_08a goes against Planning Officers' recommendations . Consultation in an earlier phase had deemed this site unsuitable for development (even partially) yet the Strategic Planning Committee have ignored this recommendation without any justification of reason making the allocation unsound.

5. The site is at risk of flooding.

6. Development of the site could have impact on wildlife and therefore contrary to EDDC Emerging Local Plan Policy PB03: protection of irreplaceable habitats and important features.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Whim_08a

as an allocated site. No building should be allowed there. Limit building on Whim_11 to 4 dwellings to meet the local need identified.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I do not think this development is compliant with the duty to co-operate. The National Planning Policy Framework has not been adhered to as Effective Cooperation has not been maintained. Section 3, paragraph 24 states Strategic policy-making authorities should engage with local communities and relevant bodies. There has not been significant engagement. There has been no general information from EDDC or Parish Council regarding this consultation. The PC have advertised this only through Facebook massively limiting who might see this and therefore significantly limiting the numbers of parishioners participating in the consultation.

There has been no consistent approach with the Strategic Planning Committee ignoring Planning Officers' recommendation and suddenly 'u-turning'.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Rob Giffard

Full name: Rob Giffard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This part of the development plan is in direct violation of the rejection of building on these sites as agreed on 1st October 2024 by the EDDC Strategic Planning Committee which followed professional planning officers; advice that the location was unsuitable for housing development.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of land Whim_08a for development is not sound for several important reasons:

Conflict with Green Wedge Protection: The site is located within a designated Green Wedge, which is protected under the EDDC Emerging Local Plan Policy OL05. This policy states that development should not proceed in Green Wedges if it "damages the individual character or identity of a settlement or could lead to or encourage settlement coalescence." Developing on Whim_08a would violate this policy in two key ways. First, the proximity to the Cobdens development increases the likelihood of coalescence with Cranbrook. Second, this would erode the distinct identity of Whimple, particularly the Bramley Gardens area, and contribute to the suburban sprawl extending eastward from Exeter.

Incompatibility with Spatial Strategy: According to the EDDC Site Allocation Report, Whimble is a "Tier 4" settlement, where the draft local plan seeks to promote limited development to address local needs. A recent Housing Needs Survey commissioned by Whimble Parish Council identified a need for only 4 affordable homes in the next 5 years. The proposed developments on Whim_08a, either alone or combined with Whim_11, significantly exceed this local need. Additionally, the ongoing Cobdens development, which includes 1,500 homes within Whimble Parish, already meets and surpasses the need for affordable housing in the village.

Lack of Safe Pedestrian Access: Access to the site would be via Church Road, which is narrow and heavily congested, particularly during peak times such as the school run (9am and 3:30pm). The police have confirmed that Church Road is not a safe route to essential village amenities such as the primary school, village shop, church, or train station. Additional development would exacerbate this safety hazard.

Contradiction of Planning Officers' Recommendations: In earlier consultations, planning officers deemed this site unsuitable for development, even in part. However, the Strategic Planning Committee has ignored these recommendations without providing any clear justification. This decision undermines the soundness of the allocation.

Flooding Risk: The site is at risk of flooding, which raises significant concerns regarding the safety and sustainability of any proposed development.

Impact on Wildlife: The development of Whim_08a could have detrimental effects on local wildlife, conflicting with EDDC Emerging Local Plan Policy PB03, which aims to protect irreplaceable habitats and important natural features.

For these reasons, the allocation of Whim_08a for development is fundamentally unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Whim_08a

from the list of allocated sites, as no development should be permitted there. Development on Whim_11 should be restricted to just 4 dwellings to meet the locally identified housing need.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This development does not meet the duty to co-operate. The National Planning Policy Framework (NPPF) has not been followed, as effective cooperation has not been maintained. Section 3, paragraph 24 of the NPPF states that strategic authorities must engage with local communities and relevant bodies NPPF, Paragraph 24. However, there has been minimal outreach. The Parish Council only advertised the consultation on Facebook, which limited its visibility and participation.

Additionally, the Localism Act 2011 requires that local communities are properly consulted on planning matters Localism Act 2011, Section 122. The Strategic Planning Committee ignored Planning Officers' recommendations and made an abrupt decision without explanation, undermining the consultation process.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sarah Gillies

Full name: Sarah Gillies

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

- The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).
Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

- Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01.

- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

- The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to... air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is an unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and

facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

- The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Samuel Glanfield

Full name: Samuel Glanfield

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.6

2. Do you consider that this part of the vision chapter is legally compliant?: Yes

3. Do you consider that this part of the vision chapter is sound?: No

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Local Plan states that “Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development”. The allocation of Exmo 20 is in conflict with this; it is not modest development. It is a “comprehensive development scheme”.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove allocation Exmo 20

4. Do you consider that this part of the vision chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

Full name: Samuel Glanfield

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.6

2. Do you consider that this part of the vision chapter is legally compliant?: Yes

3. Do you consider that this part of the vision chapter is sound?: No

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Paragraph 2.6 states that “Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development”. Allocation of Exmo 20 is in conflict with this; it is not ‘modest’ development. It is a ‘comprehensive development scheme’.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the allocation of Exmo 20, or reduce it to a modest development.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

Sophie Glanfield

Full name: Sophie Glanfield

Proposal:

5. Development in the Towns and Villages

Full name: Sophie Glanfield

Proposal:

5. Development in the Towns and Villages

Full name: Sophie Glanfield

Proposal:

5. Development in the Towns and Villages

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Proposal:

5. Development in the Towns and Villages

Full name: Sophie Glanfield

Proposal:

5. Development in the Towns and Villages

Full name: Sophie Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

****Allocating Exmo_20 is in conflict with policy OL09; it would result in pollution that cannot be adequately mitigated against (Habitats Regulations Assessment 30.01.25 highlights this concern).**

Allocating Exmo_20 is contrary to policy PB01 of the Local Plan. It does not adhere to the mitigation strategy of avoidance over mitigation. Developing Exmo_20 would cause adverse effects on internationally and nationally designated site, and could be located upon alternative site that would cause less harm.

****Paragraph 11.6(local plan) says that larger developments should be within 800m of key services and facilities. Exmo_20 is an enormous development but most of the site is much further than 800m from any services and facilities. Only very Southern parts fall within 800m. It is several miles away from actual town and too steep for people to want to walk. **Exmo_20 is in conflict with Policy TR03. it is too remote for sustainable travel; too far from the train station to commute to Exeter by train, and cycle paths in Exmo_20 won't create sustainable travel because there are not cycle paths from Dinan way into Town.**

****Exmo_20 is contrary to Paragraph 11.2 of the local plan(significant developments should be at locations which can be made sustainable through reducing the need to travel). The majority of residents would drive everywhere, having to go up to the B3179 then back down to Exmouth, taking more and longer journeys, doing many more miles.**

****Exmo_20** is contrary to Paragraph 11.2 of the local plan(significant developments should be at locations which can be made sustainable through reducing the need to travel). The majority of residents would drive everywhere, having to go up to the B3179 then back down to Exmouth, taking more and longer journeys, doing many more miles.

Policy TR01 says that walking and cycling should be the natural first choice from developments. Walking and cycling would never be a choice from Exmo_20 because it is too far away from; town centre/train station/cinema, sports centre etc. Even if they make cycle routes within the development there are not cycle routes leading from Exmo_20 into the town and it is not a good area to cycle.

****Allocation of Exmo_20** conflicts with paragraph 13.23 of the Local Plan. It would fragment many wildlife corridors, reduce biodiversity and isolate and destroy habitats. It sits within SNA 368 on the proposed Nature Recovery Network. It connects existing habitats and provides a wildlife corridor between the SAC/SPA/SSSI and the coast.

****Exmo_20** is in conflict with Policy PB 04;it would affect the integrity of a site protected under the Conservation of Habitats and Species Regulations 2017 including SAC/SPA). ****Allocation of Exmo_20** would adversely affect the natural environment and result in great biodiversity loss on the actual site and on the adjacent SAC/SPA/SSSI, in conflict with Paragraph 2.10 objective 8 of the Local Plan. ****Exmo_20** is in conflict with HE02. It will destroy the distinctive remote setting of grade 2* listed St Johns church. ****Exmo_20** is in conflict with OL01. Massive volumes of traffic running up through the entire length of the site will unavoidably destroy the dark skies, tranquility and wildness of this massive area of open countryside.

****Exmo_20** would encourage settlement coalescence between Exmouth and Budleigh, contrary to Policy OL05. It is 2.2 miles from Budleigh yet 4 miles from Exmouth and functionally connects the two towns. ****Exmo_20** is in conflict with paragraph 3.30(local plan). It is unacceptable to move the settlement boundary right up adjacent to the SAC/SPA/SSSI, leaving it dependant on specific individual policies for its protection.

Exmo_20 is in conflict with local plan paragraph 3.34. Neither Exmouth(despite being a tier 1 town)nor Budleigh (whose infrastructure and services would be relied upon by Exmo_20) have sufficient existing infrastructure and services to support such a significant increase in development.

Exmo_20 is not a development within Exmouth. It is twice as far to Exmouth as to Budleigh Salterton from the point of accessing the site, and is one of the most significant levels of development but is NOT at the principal centre of Exmouth in any way other than name, thus creating conflict within the local plan(policy SP01)

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove Exmo_20 from the local Plan/select another site as an alternative to Exmo_20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure Exmo_20 is reconsidered

Emily Glanfield

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 lies within the rainwater catchment area for Withycombe Brook, already an identified flood risk. It is on heavy clay subsoil and is a steep site running down towards Withycombe and Exmouth. Exmo-20 would increase vulnerability to flood risk through the lower lying part of Exmouth. To allocate Exmo is contrary to NPPF 162 which states that plans should take into account the long term implications for flood risk. The Local Plan should plan for climate change and “avoid increased vulnerability to the range of impacts arising from climate change.” (NPPF 164). A flood risk Assessment should have been carried out. Allocation of Exmo_20 is not sound nor justified; it is in conflict with NPPF 178 and the Local Plan policy AR01B; it does not provide wider sustainability and it does increase the flood risk elsewhere.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To have my voice heard.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Local Plan, Policy OL03 states that development proposals will only be permitted where they “preserve the visual integrity, identity and scenic quality of the district” and identifies as particularly important “night time views of dark skies, particularly where lighting is to be introduced in areas of low existing light pollution”. Exmo_20 is in total conflict with this policy. It is a vast area of night time dark skies with currently very low/non-existent light pollution. The expanse of dark skies is an inherent part of the integrity, identity and scenic quality of the area. The light pollution which would accompany Exmo_20 would unavoidably destroy this; in addition to the light from the housing development itself, the vehicular access point to the site being onto the B3179 would result in a regular, nightly stream of headlights destroying the darkness across the entire length of the site, approximately 0.8km. Allocation of Exmo_20 conflicts with Policy OL03 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Local Plan states that “permission will not be granted for development which would result in pollution that cannot be adequately mitigated. This will include: A. Pollution of the environment by gas or particulates including smell, fumes, dust, grit, smoke and soot...F. Pollution of sites of wildlife value”. The allocation of Exmo_20 is in conflict with this: the Habitats Regulations Assessments (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity to...air quality (East Devon Pebblebed Heaths SAC/SPA). This is due to the primary access for Exmo_20 being onto the B3179 which would send an enormous amount of traffic along the SAC/SPA boundary.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not place the access point for Exmo_20 onto the B3@79, sending significant amounts of traffic along the boundary to the SAC/SPA.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure integrity of the SAC/SPA is not compromised.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is contrary to the Local Plan paragraph 2.10, objective 8. It would adversely affect the natural environment and result in the loss of much biodiversity. It lies within a strategic Nature Area on the proposed Nature Recovery Network, identified as key in preserving and enhancing biodiversity. It contains many veteran and mature trees and allocation of Exmo_20 would cause loss of irreplaceable habitats (defined in the NPPF as “habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed “). NPPF 193 states that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient o veteran trees should be refused unless there are wholly exceptional circumstances”. Allocation of Exmo_20 is therefore unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that irreplaceable habitats are not destroyed.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Paragraph 2.6 of the Local Plan states that “Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development”. Allocation of Exmo_20 conflicts with this. Although on the edge of Exmouth, this agricultural site is entirely rural in character and typical of rural East Devon. Exmo_20 is not ‘modest’ development; it is a very significant, “comprehensive development scheme” and as such is not in accordance with The Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan or revert to Exmo_20b as per the original allocation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To allocate Exmo_20 is contrary to policy HE02 of The Local Plan. This states that “proposals for development...will be expected to: Be sympathetic to the listed building and its setting”. Exmo_20 is totally at odds with the setting of St John in the wilderness Church. The area around St John in the Wilderness Church is characterised by a strong sense of remoteness and tranquility, providing a timeless, remote ‘wilderness’ setting for those who worship here. This setting is integral to the character of the grade II* listed church and nearby listed buildings and would be destroyed by having a housing estate encircling it, even with a token ‘buffer zone’ left around it. To allocate Exmo_20 is not sound according to policy HE02.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To have my voice heard.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Site 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 was amended AFTER the SPC approved the Draft Local Plan on 21.12.24. 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”. There is no agreed definition of what constitutes ‘exceptional circumstances’, nor is any ‘clear justification’ given. Furthermore, despite Exmo_20 having failed the HELAA assesment, 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 to be considered sound, and to have amended the evidence base retrospectively to fit the plan makes it hard to consider the process legally compliant.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The 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 was amended AFTER the SPC

approved the Draft Local Plan on 21.12.24. 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”. 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 to be considered sound, and to have amended the evidence base retrospectively to fit the plan makes it hard to consider the process legally compliant.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure the allocation process is robust, transparent and fair

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with Policy PB01. This policy deals with the “Protection of internationally and nationally important wildlife sites” and states that development that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless they cannot be located on alternative sites that would cause less or no harm. Exmo_20 is adjacent to East Devon Pebblebed Heaths(SPA/SAC/SSSI); the only double designated wildlife site in the South West. Nightjar (listed as Annexe 1 species in the Habitats Directive) are one of the qualifying features for the SPA., and Exmo_20 is a supporting habitat for Nightjar. Studies show that loss of foraging habitat or disruption to routes to feeding areas for Nightjar could undermine the conservation objectives of the SPA. Other sites shown as preferred within the agenda for the strategic planning Committee 03.09.24 should have been allocated as an alternative to Exmo_20. The mitigation hierarchy of prioritising avoidance over mitigation (embedded in The Environment Act 2021, The Environment Impact Assessment Regulations(EIA) 2017, the National Planning policy Framework, The Conservation of Habitats and Species Regulations (2017) and other legislation) has not been followed. The allocation of Exmo_20 is not in accordance with the Local plan nor any of the aforementioned legislation, therefore cannot be sound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the Local Plan. Allocate on an alternative site that would cause less or no harm.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To see that legislation is followed.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: 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. Having selected Exmo_20 the Built Up Area Boundary was then extended up to the Pebblebed Heath boundary to include the 400m buffer zone and, specifically, to include this site.

This is totally inconsistent with the approach towards Exmo_04, also within 400m of Pebblebed Heath. In this case the top section of the site was rejected “due to major adverse biodiversity effect arising from its location within 400m Pebblebed Heaths exclusion zone” and the bottom part of the site was allocated.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the 400m Pebblebed Heath buffer zone from allocation Exmo_20, in accordance with the methodology used in allocation, and in the interests of consistency across sites.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site 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. Having selected Exmo_20 the Built Up Area Boundary was then extended up to the Pebblebed Heath boundary to include the 400m buffer zone and, specifically, to include this site.

This is totally inconsistent with the approach towards Exmo_04, also within 400m of Pebblebed Heath. In this case the top section of the site was rejected “due to major adverse biodiversity effect arising from its location within 400m Pebblebed Heaths exclusion zone” and the bottom part of the site was allocated.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the 400m buffer zone from Exmo_20 in accordance with the methodology used in allocation, and in the interests of consistency across sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that the process is being carried out transparently and with consistency.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Site 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 was amended AFTER the SPC approved the Draft Local Plan on 21.12.24. 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”. There is no agreed definition of what constitutes ‘exceptional circumstances’, nor is any ‘clear justification’ given. Furthermore, despite Exmo_20 having failed the HELAA assesment, 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 to be considered sound, and to have amended the evidence base retrospectively to fit the plan makes it hard to consider the process legally compliant.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The 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 was amended AFTER the SPC approved the Draft Local Plan on 21.12.24. 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”. 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 to be considered sound, and to have amended the evidence base retrospectively to fit the plan makes it hard to consider the process legally compliant.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To see that the decision making process is being carried out transparently and robustly.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo 20 is not consistent with National Policy. NPPF States that Plans should “be shaped by early, proportionate and effective engagement between plan makers and communities....and statutory consultees”. Natural England, a statutory consultee, was not consulted on this site despite it adjoining a SAC/SPA/SSSI.

Neither was there any engagement with Budleigh Salterton Town Council despite the fact that the development will rely primarily on the infrastructure and services of Budleigh (from vehicular access point of Exmo_20 it is almost twice the distance to Exmouth town centre as to that of Budleigh). The Town Council is a ‘prescribed body’ which will be directly and significantly affected by the development of Exmo_20.

There was no effective engagement with communities about Exmo 20. It was a site which had failed HELAA as “available but not suitable or achievable”, a ‘rejected’ site throughout the period of community engagement and was clearly marked in red as such on all the maps available and shown to the public. From the time it was allocated on 03.09.24 there was no opportunity for communities to engage nor has there been any opportunity for engagement since, despite repeated attempts by members of the community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure allocation of Exmo_20 is duly reconsidered

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 is in direct conflict with the Local Plan, Policy PB02, and not in accordance with the Environment Act 2021. Policy PB02 states that development proposals that would cause adverse effects upon important wildlife sites will not be permitted unless they cannot be located on alternative sites which would cause less or no harm. The development proposed at Exmo_20 will cause adverse effects upon important wildlife sites (Pebblebed Heaths) and could be located on alternative sites which would cause less or no harm. It also states that it must be ensured that there is no degradation to the wider ecological networks and priority habitats. Exmo_20 sits within a 'Strategic Nature Area' (SNA 368) on the proposed Nature Recovery Network connecting the coast to the SAC/SPA/SSSI as part of the Local Nature Recovery Strategy. According to the Environment Act 2021 EDDC has a legal responsibility as a supporting authority to ensure that the planning system dovetails with the Local nature Recovery Strategy to avoid conflicting steers for the same piece of land. Exmo_20 is in direct conflict with this.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Neither the Local plan nor national policy were followed in the allocation of Exmo_20. Chapter 13, paragraph 13.5 of the Local Plan states that "All proposals should follow the mitigation hierarchy: first avoid biodiversity impacts; if unavoidable mitigate them". Sites were not selected with regard to the mitigation strategy; the initial Habitats Regulations Assessments was done after the plan was agreed for publication and many sites near to Exmo_20 were rejected for reasons which fall lower down the Mitigation Hierarchy and should have been allocated in preference to Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo-20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure allocation of Exmo_20 is reconsidered

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Local Plan (paragraph 3.7, appendix 6, Stage 3. 1.33) states that “The site assessment ensures a consistent level of information is available for each site, to inform site selection”. The allocation of Exmo_20 was not in accordance with this and is not sound. Having failed the HELAA, Exmo_20 did not go through the assessment stage of the Site Selection process and there was minimal information available to councillors regarding Exmo_20 compared with the details given about other sites. No attempt was made to gather or provide the relevant information which would have enabled consistency in site selection. The site boundary of Exmo_20 shown to councillors when selecting sites was wildly inaccurate compared with other sites and included the grade II* listed St John’s church, several listed buildings and numerous privately owned homes (approximately one third of the site voted on by councillors is unavailable). This had been brought to the attention of the SPC several times since August 2022 but no attempt was made to correct it and it was not amended until 22.11.24. by which time site allocations we’re no longer being assessed or revisited. This is inconsistent with the detail with which other sites were scrutinised.

The site is of heavy clay subsoil and sits on the main rainwater catchment area of Withycombe Brook, already an identified flood risk - information not given to councillors when allocating Exmo_20, yet the clay subsoil and the far lesser flood risks other sites would potentially cause were discussed extensively and consequently given as the reason for them not being allocated). The level of information available for Exmo_20 was totally inconsistent with the level of information available for other sites.

The greatest and most concerning level of inconsistency has been shown in the way information was considered regarding the 400m Pebblebed Heath Impact Risk Zone. In

the case of Exmo_04 which, like Exmo_20, has part of the site falling within 400m of Pebblebed Heath it was judged for this reason appropriate only to select part of the site (the bottom part - not within 400m), and to reject part (the top part - within 400m). This is totally at odds with the way Exmo_20 was allocated in its entirety including the land within the 400m buffer zone. There was no consistency shown. The fact that the Exmo_20 adjoins the SAC/SPA/SSSI was not even mentioned in the SPC meetings despite proximity to the SAC/SPA/SSSI being thoughtfully discussed in the case of other sites at greater distances from the Pebblebed Heaths. Site assessment has not ensured a consistent level of information was available for each site; there was minimal information gained from site assessment of Exmo_20, because minimal assessment was undertaken of Exmo_20 compared with other sites. Had Exmo_20 passed HELAA and gone through stages 1,2, and 3 of the site selection process it would have undergone site assessment and the levels of information available for it would have no doubt been more consistent. As the process happened, allocation of Exmo_20 was not been carried out in accordance with The Local Plan, (paragraph 3.7, appendix 6, Stage 3. 1.33).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exclude the top 400 buffer zone from site Exmo_20 and from the Built Up Area Boundary.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ask that Exmo_20 is treated consistently with other sites, and the 400m buffer zone consistently given the same protection across sites.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: In allocating Exmo_20 EDDC have failed in their duty to co-operate with Budleigh Town Council. The Planning and Compulsory Purchase Act 2004 states that The Local Authority must co-operate with every body that is “prescribed or of a prescribed description” in the preparation of development plan documents and other development documents. Budleigh Salterton Town Council are a prescribed body, yet EDDC failed to even make it aware of this development. Allocation of Exmo_20 is critical to Budleigh Town Council; with vehicular access to the site being only 2.3 miles away from Budleigh Salterton but 4.0 from Exmouth Town centre the development would be primarily reliant on the services and infrastructure of Budleigh Salterton which, as a tier 3 town, would be totally unable to cope.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that my voice and opinions are heard.

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 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.

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 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 to go to regulation 19 consultation without them. THIS RENDERS THE ALLOCATION OF EXMO _20 IN DIRECT CONFLICT WITH NPPF. The initial HRA was published AFTER the plan was agreed for regulation 19 publication, therefore did not inform the plan making process, and sites were not selected with regards to avoidance over mitigation as is dictated in the Conservation of Habitats and Species Regulations 2017.

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 demonstrates total disregard for the Nolan principles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: With regards to Exmo_20 EDDC have failed in their duty to co-operate. 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 before the initial Habitats Regulations Assessment was published on 30.01.25, which 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 in their duty to do-operate EDDC have allocated Exmo 20 against the principles of the

mitigation hierarchy of Natural England; to prioritise avoidance over mitigation. The mitigation hierarchy is a fundamental principle in achieving Biodiversity Net Gain in England. By prioritising avoidance, minimising losses, and resorting to compensation only when necessary, developers can help protect and enhance biodiversity. (6 Feb 2025)

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: With regards to Exmo_20 EDDC have failed in their duty to co-operate. 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 before the initial Habitats Regulations Assessment was published on 30.01.25, which 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 in their duty to do-operate EDDC have allocated Exmo 20 against the principles of the mitigation hierarchy of Natural England; to prioritise avoidance over mitigation. The mitigation hierarchy is a fundamental principle in achieving Biodiversity Net Gain in England. By prioritising avoidance, minimising losses, and resorting to compensation only when necessary, developers can help protect and enhance biodiversity. (6 Feb 2025)

Full name: Emily Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Policy SP01 of the Local Plan proposes that the most significant levels of development will be at the principal centre of Exmouth. Allocation of Exmo_20 is contrary to this as the site is completely detached from Exmouth town and is actually closer to Budleigh Salterton. Although the housing might be situated at the lower end of the site, the vast majority of the access into and out of the site would be from the very top of the site onto the B3179, resulting in Exmo_20 being a detached and isolated housing estate. From the southern end of the site to access to the train station on foot, to commute to Exeter for example, takes 50 minutes at a brisk pace. From the northern end of the site it takes 1 hour 15 minutes. Exmouth town centre is a 4 mile drive from the vehicular access point of Exmo_20, and the steep topography of the site makes walking and cycling unviable options. Budleigh Salterton is much closer and more accessible from the site access point, being only 2 miles from this point. It is an Exmouth development in name only and in functional terms is not development at the principal centre of Exmouth. Existing housing development already stretches several miles out from the town centre which has not managed to grow with the increased population. With the access to Exmo_20 all being at the northern edge of the site this development cannot be considered to be at the Principal Centre of Exmouth.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from The Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that Exmo_20 is given proper consideration.

Joe Glanfield

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed not suitable or achievable during HELAA. It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations with Devon County Council.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to see that there is integrity in the process and that it is being adhered to.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: On 3/9/24 EXMO_20 went from 'ongoing assessment' to 'allocated' and no further consideration or representation was given to the public or the Strategic Planning Committee despite the assessment not being complete. Exmo_20 did not pass HELAA being deemed "not suitable or achievable". Due to this the plan making process has not been in accordance with the PCPA 2004. stage 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Restart the process again or remove EXMO_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To exercise my democratic right and see that there is integrity to the set out process.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" at site sifting stage (HELAA stager 2). It has never been either preferred or 2nd choice therefore the site was omitted from regulation 18 consultations. On 3/9/24 the site went from 'ongoing assessment' to 'allocated 'and no further consideration or representation was permitted to the public or the strategic planning committee despite the assessment not being complete.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan or start the process again and include the representation of the public.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to have my democratic right to see if the process is transparent.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with policy AR01(B). The site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective and the land is often waterlogged. Building on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to hear how additional drainage won't add to Withycombe brook to an unmanageable level.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, therefore defining this land as acceptable for development. Housing cannot be built on the buffer zone, however, by including it within the settlement boundary it is available for other kinds of development. Therefore the plan is failing to robustly protect the Pebblebed heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan or reduce the size of the development.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with policy OL05. The main access point to Exmo_20 is 4 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the development. Getting from the site entry point on the B3179 it is significantly shorter and quicker to get into Budleigh town then Exmouth town, therefore naturally this will be where people go for key services including doctors, dentists and primary schools. This development clearly merges the two towns and creates coalescence.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan. Reduce the size of the site and ensure there is better access directly into Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to hear with a primary access point on the B3179 this doesn't lead to coalescence between Budleigh and Exmouth and why Exmouth would be the primary town to rely on for services when they are closer to Budleigh.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy HE02 - a development the size of Exmo_20 surrounding St. John in the Wilderness Church (grade II* listed) will have significant adverse effects on the tranquil surroundings of the church and churchyard, drastically altering the rural, peaceful setting for worship which currently exists for the congregation. The outlook from the church will completely change and feel a distinctly different to how it currently feels in the churchyard.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of EXMO_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL01. The area around the site - St John in the Wilderness church is characterised by dark skies and a strong sense of remoteness and tranquillity, a 'wilderness' setting integral to the grade II* listed church which would be harmed by having a housing development encircling it, regardless of a buffer zone being left. The name of the church and the hamlet itself would almost become ironic as it would not be in the wilderness at all. Likewise having an entrance on the B3179 next to the pebble bed heath will cause a constant stream of traffic headlights shining across this protected area which would completely change the feel of it and would have a devastating impact on the bird life wanting to nest there.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan. Substantially reduce the size of it and take away access onto the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, many of which show signs of veteranisation, as well as miles of hedgerows that provide habitats and wildlife corridors. Disrupting and in most instances destroying them will cause a huge loss of wildlife and cannot be replaced by planting new trees and leaving the odd green space.replacement These provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. EXMO_20 isn't on the pebblebed heath but it is countryside that is essential to the wildlife that live on it. Exmo_20 lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan or reduce it and only build on land closer to Exmouth and further from the pebblebed heath.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to understand how conflict to paragraph 13.9 of the National planning policy framework will be avoided.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

LLOCATION OF Exmo_20 is in conflict with paragraph 13.23. It lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of Exmo_20. Nightjar are a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of much biodiversity, both on site and on the adjacent SAC/SPA/SSSI. The proposal of site EXMO_20 is across important wildlife corridors and also its proximity to the pebblebed heath means it will reduce biodiversity, especially within the bird population as there important nesting sites on the Common.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I worry that members of the planning committee don't realise what a unique site Woodbury common is.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (30.01. 25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 and any other sites that are close to the pebblebed heaths and replace with other sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy OL09. The Habitats Regulations assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. This is due to the primary access to Exmo_20 being into B3179 which would send the significant increase in traffic caused by the large site along the boundary of the Pebblebed Heath.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan. No access to the B3179 and a reduction of the site size.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to Exmo_20's restricted access arrangements, the site will vastly increase car and other vehicle movements. This significant additional traffic will be focussed on the B3179 which will be used to access Budleigh Salterton (the nearest town and beach) and Exeter which is the likely place of work for most people living in EXMO_20. The B3179 is not designed for the amount of traffic it already has let alone more, likewise it is especially not suitable for a high volume of large vehicles like lorries and buses. The only way a bus service could serve the needs of residents of EXMO_20 is if it accessed the B3179 and had routed to Budleigh and Exeter but the road is not suitable for these vehicles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan or reduce it and take away access onto the B3179.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to understand and input into how EXMO_20 can have new sustainable travel arrangements to the places they are most likely to go.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 3.34: despite being a tier 1 settlement Exmouth is already severely struggling to provide sufficient infrastructure to its existing population. It is already nearly impossible to get a doctors appointment within a useful time frame and additional surgeries are not a part of this proposal. Neither will it provide another secondary school - within the last 3 years numerous children have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth is at breaking point that sewage is regularly discharged into the sea resulting in the beach closing for swimming. Beyond the devastating impact on marine life this also damages Exmouth's reputation as a holiday destination and therefore its leisure economy. This was well documented and reported last summer and needs a solution to not create further problems with large scale development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with paragraph 11.2. It will increase travel needs and necessitate cars to take longer routes. The main vehicular access point is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in a very minimum of 0.5km drive just to get from the site entrance to the housing. This would result in at least 1km of 'on site' driving every time you went out anywhere and returned home. This also means from the B3179 site entrance you need to drive a very round about route to get into Exmouth centre, in total over 4 miles. Exmo_20 would undoubtedly significantly increase car miles.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan. Alternatively remove access to the B3179 and reduce the site size keeping it as close to Dinan way and Exmouth town centre as possible.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because I want to understand how EXMO_20 could fulfil Paragraph 11.2.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy TR01. TR01 states that Walking, wheeling, cycling or public transport should be the natural first choice. It would not be the first choice of transport from EXMO_20 for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. This would not be solved through a public transport service as the only likely one is buses which people would not choose if they have a car. I would argue the distance EXMO_20 is from any services and infrastructure means people will only be able to live there if they have access to a car and are prepared to do the majority of their journeys in it.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Either withdraw EXMO_20 from the local plan or withdraw the access to the B3179 and reduce the site size where people can travel more directly into Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand how the planning committee possibly think this site will achieve policy TR01 when it is so far from any key services.

Full name: Joe Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ALLOCATION OF Exmo_20 is in conflict with policy SP01. Although Exmouth is a tier 1 town, is totally unsuitable for further significant growth. It is on a peninsula, wedged between the river Exe and the coast. The town centre is at the south end of the peninsula making 360 degree development impossible. Exmo_20 is 4 miles by car from Exmouth town centre and detached from it; it cannot be considered to be a development in Exmouth. Access from the B3179 will make it closer to Budleigh Salterton then to Exmouth. Any development here will be a long distance from the town such that it is an unsustainable location.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_20 from the local plan or significantly reduce the size of Exmo_20 so it is not accessed from the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure the correct information is outlined when it is considered and I have a concern that the people discussing the allocation don't know the specific details of the area.

Full name: Samuel Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo 20 conflicts with policy. It is not 'modest development', it is 'comprehensive development scheme'.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove allocation of Exmo 20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Samuel Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The enormous increase in dog walkers that such a massive development would necessarily incur would add so much dog mess that the nutrient levels in the soil would be affected. This conflicts with NPPF 187e.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size massively and keep site access away from B3179 and Pebblebed Heath boundary.

Full name: Samuel Glanfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: It conflicts with NPPF 187e. Building 700 homes here will cause an unacceptable increase in levels of air and noise pollution to the Pebblebed Heaths, a SSSI, SAC AND SPA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not allocate this site.

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 assesment, 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 to 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

robert and christine glanville

Full name: robert and christine glanville

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We do not feel that we are qualified to comment on the legal compliance of this part of the Development in the Towns and Villages chapter.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whimble is a Tier 4 settlement, so the addition of 83 houses is at odds with the Local Plan directive to promote 'limited development to meet local needs'

Much of Whimble is in a critical drainage area where surface water needs to be managed to a higher standard than normal.

WH_08 was initially not recommended for allocation for any size of development by EDDC officers (2020 -2040 site selection report), but recently the East Devon Strategic Planning Committee chose to allocate contrary to officers recommendations. We are not sure on what basis there was a change of mind because the original reasons for not allocating have not altered.

1. Church Road lacks footways until its junction with Bramley Gardens (only two very small stretches of pavement exist on Church Road at the junction with Bramley Gardens, approx. 35 and 25 metres in length each). The lane to the north of the site is very narrow and lacks footways.
2. A narrow strip of land along the western site boundary is within flood zone 3. Grade 3 agricultural land.
3. The site is within a Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan.
4. There is an unconfirmed wildlife site (Gateshayes Farm Orchard) in part of the north of the site. This land also forms a core nature area (grassland). There are two small watercourses within the site. Significant moderate adverse effect predicted. The site is within the East Devon Pebblebed Heaths SAC HRA mitigation zone.

The lane leading off the London Road (old A30) to Whimble village as far as the Thirsty Farmer Public House is at least a mile long. This is an extremely dangerous road for pedestrians, motorists and horses alike due to its narrowness (pinch points) and almost total lack of pavements and lighting. We are advised that Devon Highways have informed EDDC 'the road through the village being very narrow preventing the flow of two-way traffic in numerous places. The majority of the main road leading to and through the village having no pavements or adequate lighting. The lane to the north of the site is very narrow and lacks footways'. The building of the proposed quantities of houses would result in a totally unacceptable and dangerous increase in traffic on the village road due to the reasons already stated.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Due to the issues relating to the inadequate road through the village it is difficult to see how such a plan can be modified. Our suggestion would be to consider marginally increasing the currently proposed building of a new town at nearby Farringdon, where all the required infrastructure would be catered for and thereby provide a safe environment e.g suitable roads, pavements, lighting, schools, shops, GP Surgeries. This would alleviate the unrealistic demands for building in small villages in East Devon which, particularly in Whimple, provide very little of this type of infrastructure.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: We do not feel we are qualified to comment on the duty to co-operate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Vikki Godden

Full name: Vikki Godden

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to formally object to the proposed allocation of Whim_08a in the EDDC Emerging Local Plan. As a resident of Bramley Gardens (Hindcott, Bramley Gardens, Whimble, EX5 2SJ), I have serious concerns regarding the safety implications, environmental impact, and the flawed consultation process associated with this proposal. First and foremost, the site lacks safe pedestrian access to essential services in Whimble. Church Road has no pavements, making it an unsuitable and hazardous route for residents—particularly children and families—who need to reach the shop, school, or train station. This contradicts policies that prioritize sustainable and secure transport solutions. Additionally, the land falls within a designated Green Wedge, intended to prevent the merging of Cranbrook and Whimble. Development here would compromise the distinct identity of the village and violate the principles of Policy OL05, which seeks to protect local character and landscape integrity. Environmental concerns are also significant. The site is home to various unconfirmed wildlife species, including owls, bats, birds of prey, badgers, and deer. Furthermore, the flood risk in this area has not been adequately reassessed, despite previous recommendations for further investigation. The absence of up-to-date environmental and flood risk assessments means the plan lacks the necessary evidence to support this allocation. Equally troubling is the lack of transparency in the consultation process. At a public consultation event in Whimble, officers explicitly stated that this site was not under consideration. Its sudden inclusion in the plan, without proper explanation or community engagement, raises serious concerns about the integrity of the process. For these reasons, I strongly oppose the allocation of land next to Bramley Gardens (Whim_08a) for development.

Mark J Godfrey

Full name: Mark J Godfrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: REMOVE Exmo_20 from the local

Cynthia Goodyear

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.

Helen Gottschalk

Full name: Helen Gottschalk

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access from the development Exo_20 would be onto the B3179, putting extra pressure on an already busy and winding road. Vehicles from 700 houses would add an extra 840 cars (average vehicle per household =1.2) to the local road network, including feeder lanes to Woodbury (Castle Lane) and Exmouth (Higher Marley Road) that would undoubtedly have a negative impact on local residents, wildlife and biodiversity. Residents of Exmo_20 would put enormous pressure on the infrastructure and service provision of Budleigh, as this is the nearest town centre (at 2.3 miles). This undermines the hierarchy settlement leading to the merging of Budleigh and Exmouth, contrary to Policy OL05 of the local plan.

An alternative site, such as a new town, would seem a much more sustainable option, enabling planners to provide employment opportunities with local services and infrastructure that are fit for purpose. It is plain to see that South West Water are TOTALLY incapable of managing current levels of sewage, blaming almost constant overflows and spills on rainfall levels. Looking at Met Office rainfall maps (https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/library-and-archive/library/publications/factsheets/factsheet_7-climate-of-south-west-england_2023.pdf) it is clear to see that East Devon has some of the lowest rainfall in the South West Region - so it is impossible to believe that they would be able to manage any extra capacity set out in the local plan, including that created by Exmo_20

Exmo_20 would also create unprecedented damage to the Pebblebed Heaths, which is a designated NNR /SSSI / SAC / SPA, because this area is a habitat that supports bats

such as Daubenton's and Pipistrelles, which are considered European protected species. Allocating Exmo_20 is contrary to the HELAA, the site selection Methodology and Policy PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation.

Exmo_20 would also cause harm to the nationally important sites of Woodbury Castle and St Johns in the Wilderness Grade 11 listed church, contrary to POLICY HE02

Exmo_20 would have a detrimental effect on the open countryside and designated NNR / SSSI / SAC / SPA - destroying the tranquility, wildness and dark skies offered by these important green spaces - contrary to POLICY OL01. It would also have a detrimental impact on the biodiversity of important species such as the Nightjar and Dartford Warbler, currently found on Woodbury Common. East Devon is a significant stronghold for Dartford warblers, holding a substantial portion of the UK and Devon breeding population.

Exmo_20 would be in conflict with the Strategic Nature Area 368, fragmenting and isolating already fragile habitats and destroying wildlife corridors, contrary to paragraph 13.23 of the Local Plan. It would cause irreparable harm to the biodiversity of these protected habitats, veteran trees, hedgerows, and verges, along with the biodiversity of wildflowers and wildlife inhabiting our local hedgerows, woodlands and verges.

Exmo_20 would be built on heavy clay subsoil which could exacerbate the flood risk to properties and land along Withycombe Brook. This is contrary to Policy AR01B.

Exmo_20 would increase the need for car travel, contrary to Fig. 7 - the energy hierarchy, and increase traffic pollution and congestion, contrary to Paragraph 11.2

The isolated location of the suggested development is further away than 800m to existing services and facilities, contrary to Paragraph 11.6. If you have ever been on B3179 you would understand that it would be incredibly dangerous to walk or cycle along this route, especially with children or pets. This is contrary to Policy TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan and replace it with an alternative site, such as a new town, which would seem a much more sustainable option, enabling planners to provide employment opportunities with local services, facilities and infrastructure that are fit for purpose.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Attending a hearing session is my democratic right, allowing me to participate in the decision-making process, present my views, and potentially influence the outcome of a planning application or local plan, ensuring my concerns are heard and considered.

Sue Govan

Full name: Sue Govan

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo20 would cause harm to the adjoining pebble bed heaths SSSI, SAC, SPA & NNR where scarce nightjars nest as well as many other birds and wildlife. Any light pollution would negatively affect nightjars and their food sources. This is due to Exmo20 being a supporting foraging habitat. Allocating Exmo20 is contrary to the HELAA, the site selection methodology and policy PB01 of the local plan. Exmo20 would have a detrimental affect on the internationally designated wildlife sites, eliminating the tranquility, wildness and dark skies which is contrary to policy OL01. Exmo20 would be in conflict with the strategic nature area 368, fragmenting habitats and destroying wildlife corridors contrary to paragraph 13.23 of the local plan. It would cause harm or remove irreplaceable habitats, old trees and species rich hedgerows across the site contrary to paragraph 13.9.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Avoid developing the area near the pebble bed heath, any development further back should have sufficient wildlife corridors and green spaces

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Carol Jane Griffiths

Full name: Carol Jane Griffiths

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Access point of Exmo_20 is nearer to Budleigh Salterton than Exmouth. Therefore Budleigh services and infrastructure would more likely be used by Exmo_20 residents. It would lead to conurbation of Budleigh and Exmouth, contrary to POLICY OL05 of Local Plan.

Exmo_20 would cause harm to Heritage assets at St Johns Road - it would destroy the rural setting for St John in the Wilderness Grade 11 listed church. Contrary to Policy HE02. It would cause harm to the Pebblebed Heaths. Its allocation is contrary to the HELAA and Site Selection Methodology and Policy PB01 of the Local Plan. It is so close to the Strategic Nature Area 368 light pollution, noise and traffic will have a detrimental to wildlife and the sites. This is contrary to Paragraphs 13.23 and 13.9 of the Local Plan. Its location would increase the need for car travel, and thus increase volume of traffic on B3179, only a small country lane with no lighting or footpath. Also there is a lot of wildlife crossing this road. Residents of Budleigh use this road to travel to Exeter. One vehicular entrance/exit onto B3179 from a housing estate of 700 will become completely congested at certain times of the day when built, not to mention construction traffic whilst it is being built. This is in conflict with Paragraph 11.2 The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to Paragraph 11.6. It is too far and too steep to walk or cycle to either Budleigh or Exmouth town centre/seafront. This is contrary to Policy Policy TR01. At present there is no public transport in that area. People move to Exmouth/ Budleigh because of the accessibility of the sea and beaches.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Simon Griffiths

Full name: Simon Griffiths

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: My comments herein refer to the Exmo_20 development site, having regard to various consultation documents, committee meetings and earlier consultations :- 1)
Concerning vehicular access, I understand that Devon County Council have commented that they believe St. Johns Road to be unsuitable and that it is unclear whether access via the housing estate to the south would be able to accommodate additional traffic. They conclude that vehicular access can only be via the B3179. In view of DCC comments in a 2016 report on the Dinan way extension it is understood that around a third of working commuters travel to Exeter and that 80 percent of these are by car. The B3179 road is narrow in many places, without any existing footways or lighting. In the absence of any traffic or highway engineering assessment reports included in the consultation documents it is my contention as one who has been involved professionally in highway schemes that widening of the B3179 should have been evaluated before Committee Members apparently decided to over-rule officers rejection of Exmo_20 as a viable option. Any proposed development site must be deliverable in terms of infrastructure, yet in the working party meetings last summer concern was expressed that there may be a risk to EDDC in the absence of active land owner promotion. Meanwhile existing bus services are few and far between connecting Exmouth, Budleigh Salterton and Exeter. In the documentation it is recorded that an indicative Master Plan has been prepared for Exmo_20, that a 400 metre exclusion zone will separate the development from the Pebble Bed Heaths and that most of the development will concentrated in the southern part of the site. I and others are others are not only prevented from a full appreciation of the impact of this large, long site by the absence of the alleged site layout and by the absence of traffic / highway data, but also by the lack of a detailed infrastructure Delivery Plan. I am thus concerned that Members have decided to include Exmo_20 without proper consideration of the risks of

congestion on the B3179, any apparent discussions regarding public transport provision, whether the road can be widened without requiring compulsory purchase orders, whether provision is feasible for cyclists, and pedestrians, and for animals to safely cross the road. There is also the matter of the northern part of the site adjoining the B3179 being substantially within the Minerals Safeguarding area. Without properly considering and evaluating the viable delivery of homes on this proposed site and the risks of non-delivery due to technical or financial risks the proposal is contrary to Policy TR03. 2) Failing discuss the impact of the proposed development on Squabmoor reservoir and Bystock Ponds and the associated ground water regime is contrary to Policy PB01. For any competent developer to be able to confirm interest they will need to fully appraise and cost the site development risks. EDDC have prove proposed Exmo_20 with undue haste, seemingly because it is a large area of land. 3) I would also add that this site if fully occupied with housing will lead to a great loss of the pleasant rural vistas at the edge of edge of Exmouth as well as substantially jeopardising the as yet the natural environment. 4) Exmo_20 should have been referenced as partly a Budleigh site owing to its risk of developing a future connurbation. Not doing so may have led Budleigh residents into not responding to the consultation. Budleigh may well be heavily impacted in terms of traffic. 5) the large number of proposed houses - 700, will impact o on community facilities. Apparently schools and healthcare facilities in the area are already reportedly stretched and and this amount of houses at the edge of Exmouth / Budleigh / Woodbury needs a proper infrastructure plan to cost appropriate provision.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Charlotte De Groot

Full name: Charlotte De Groot

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

1. The main access point to the proposed site Exmo_20 is significantly closer to BUDLEIGH SALTERTON than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh, its High Street, doctor's, School and Beach etc, would be the preferred choice for residents of Expo_20. This would undermine the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

2. Exmo_20 would cause harm to the adjacent Pebbled Heaths (SSSI/SAC/SPA/NNR) due to the Exmo_20 location being a supporting foraging habitat. Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

3. Exmo_20 would cause harm to the local heritage assets, most significantly St John in the Wilderness Grade II* listed church and churchyard, drastically altering the attractive rural setting for worship and burials which currently exists. This is contrary to POLICY HE02.

4. Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the "tranquility, wilderness and dark skies" of the countryside, which is contrary to POLICY OL01.

5. Exmo_20 4. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways , would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already beyond its design capacity. This is in conflict with POLICY AR01B.

6. Exmo_20 would be in contravention of PARAGRAPH 11.2 as the need for car travel would increase traffic congestion. The isolated location is unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far and too steep from any town centre to use walking or cycling as a mode of transport. This is contrary to POLICY TR01.

7. Exmo_20 development would be in conflict with the Strategic Nature Area 368, fragmenting and isolation habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

8. Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is 'currently not sufficient certainty to rule out adverse effects in integrity in relation to.... air quality' (East Devon Pebblebed Heath SAC/SPA) such that the Plan fails the integrity test.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan - The current local infrastructure of Budleigh cannot support any

new residential homes. Of particular concern are the sewage works, education facilities and medical facilities.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Amanda Gulbranson

Full name: Amanda Gulbranson

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmouth is a growing town, and with the sea and river Exe as boundaries in 2 directions- this will inevitably impact on other areas where growth is considered- however it is absolutely essential that this is done with careful consideration that is sympathetic to the existing inhabitants of Exmouth and the environment which plays an important part regarding the quality of life of the town's population.

With other large scale developments still in progress, the full impact of these have still not yet been experienced- but already there is insufficient infrastructure within the town to support the needs of residents. For example; timely access to healthcare (GP appointments, dentists....noted that a recent statement from a GP in Woodbury changed their catchment area for new patients which will impact on new homes currently being built too). Whilst primary school placements I believe as still sufficient, schools within the current catchment area may not be able to cope, and the town's only secondary school is already full- with local families already being offered places in e.g. Cranbrook despite putting Exmouth as their first choice. There are already local amenities, a struggling sewage system that cant cope with existing demand which is resulting in increased pollution, and despite SWW's plans to improve this- this work will be completed over years..... Neither is the growing population served with sufficient grocery stores/ supermarkets...and despite recent announcement of another supermarket being planned- this will help to address current need, and not increased need that further development will have. Roads in and out of Exmouth are already busy and becoming busier- and whilst additional roads are being built in Exmouth- the rate limiting factor still remains with only 2 main routes from Exmouth to Exeter (which are busy and also increasingly blocked if weather causes flooding). Further development,

and the time and scale of this MUST consider and protect Exmouth for current and future generations.

With some development likely to be essential, I do not consider the site proposed for Exmo-20 to be a suitable development site at this time due to a myriad of different reasons which all, in my opinion and understanding, all contravene existing local policy. The location of Exmo_20 also means that the proposed development will have a significant impact on the nearby town of Budleigh, which will be closer/ easier to access than Exmouth- and therefore have a significant impact on their local resources (healthcare, shops/ resources) too.

Further reasons I am concerned and feel that this site (Exmo_20) is currently inappropriate: Conflicts with the Strategic Nature Area 368, fragmenting and isolating habitats and destroy wildlife corridors (contrary to PARAGRAPH 13.23 of the Local Plan). This would cause irreplaceable harm to existing habitats, trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. I have observed and heard over 20 different species of birds in the last few months alone. These include goldfinches, bull finches, green finches, gold crest, fire crest, song thrush, mistle thrush and tawny owls, as well as buzzards, sparrow hawks and occasionally a nightjar. Mammals include deer, badgers, dormice and bats (including long-eared brown bats + other species). In addition to this, the area supports a biodiversity in insects and plants. We all live in houses that were once fields.....but it is vital that further development is carefully planned and has to support balance. This is something my son and his generation are also concerned about. At the very least, IF a development (of any scale) is considered- tree preservation orders should be blanketly applied to the existing woodland areas- this would ensure consistency in line with TPOs that have been blanketly applied regarding other planning proposals (private) that have been processed in the area- and therefore should apply equally to development whatever the scale.

Exmo_20 is in conflict with POLICY OL09 and POLICY PB04 as the Habitats Regulations Assessment (30.01.25) which states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebble bed Heaths SAC/SPA) such that the Plan fails the integrity test. One of the main site of access proposed for this development is opposite the SAC/SPA. As discussed above, the site of the development/ extension of the Exmouth plan for housing will adversely affect the natural environment and result in loss of diversity- within the area as well as surrounding areas. (See objective 8 paragraph 2.10). EXMO_20 is also in conflict with

paragraph 13.23 as it lies within an identified strategic nature area (SNA368) and is part of the local Nature Recovery Strategy; connecting habitats and wildlife corridors between the Pebble bed Heaths through to woodland which lies south of this.

The development site would have a significant impact/ cause potential harm to a local place of worship: St John in the Wilderness (Grade II* listed church- a heritage asset) by eroding the rural setting- which provides a tranquil, calm and peaceful setting for worship and reflection- including the surrounding churchyard. This is contrary to POLICY HE02. Development of Exmo_20 on heavy clay subsoil with ineffective soakaways, would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Previous developments in St Johns Road (near St Johns in the Wilderness church) did indeed increase run off into the brook which had a detrimental impact on the bank and requiring some residents of Meadowview road to have to take action to strengthen the remaining bank to prevent further erosion. The run off of water that comes down st johns road after heavy rain is significant- and can cause temporary flooding in the low point of the road before going up to Dinan way. The size of the development proposed for this land- currently fields and woodland which help to delay soak away- would be significant.

Exmo_20 would increase the need for car travel, contrary to Figure 7, and increase traffic congestion, in conflict with PARAGRAPH 11.2. The location on the outskirts of town provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. Whilst walking and cycling are potential options- this is unlikely to be a suitable option for most (and with the lack of a robust cycle path infrastructure to support this and planned development of road so that Dinan way will be busier with larger vehicles- also likely to be undesirable to cycle on and unsafe). The reality is that families often have at least one car, often 2 now, to support work and lifestyle choices.....and even if they don't drive to the shops themselves- there is increased use of on-line ordering and delivery- which will increase traffic to the development site (via unsuitable access routes which have been proposed e.g. via Meadow View and Southern Wood- which, when I have on occasion driven down these roads- which parking on both sides- essentially makes the road a single wide road for passing- so increased volume of traffic caused by new development will be detrimental and is also contrary to POLICY TR01. Also- even if people walk- foot paths (ie that cross the Dinan way near the bus stop and further up) are potentially dangerous with current level of traffic (and I am really concerned re. school children that use this walkway too – which is a proper walk way through from St Johns road down to Dinan way – crossing over to Meadow View

Road- which would be a route if new development supported) . With new road link from Exeter road to Dinan way- the increased volume of traffic (and larger vehicles) will add to this risk- and despite the speed limit being 30mph, this is not always adhered). The access to the development is limited and doesn't support a development of the size and scale proposed. There are only 2 access roads identified for this proposed site; via Southern Wood and also the B3179 near the archery club. Both access points will mean a significant increase in the traffic on residential road and the 'common' road (B3179 through Woodbury). Also- as seen recently when the Exmouth to Budleigh road was closed due to an accident (I believe) traffic was redirected (sat nav?) via St Johns road- this resulted in a lengthy queue waiting to exit the road on to Dinan way- essentially blocking the road and taking a long time to clear- therefore this is an example of what a small change could cause..... My understanding is that the site has no other points of access and is 'land locked due to other land ownership. It would seem sensible to therefore consider alternative sites (especially because of the scale proposed) at this time- and perhaps revisit this site in the future when access rights and options have changed and hopefully improved when considering the development and impact of a larger scale development.

Personally (and I know that many feel the same way) I feel strongly that an alternative site to Exmo_20 should be selected for housing as part of the revised local plan- one that is available, achievable & suitable within the HELAA. Allocating Exmo_20 is contrary to the HELAA, the Site Selection Methodology & POLICY PB01 of the local plan and not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. Exmo_20 would also cause harm to the adjacent Pebble bed Heaths (SSSI/SAC/SPA/NNR) due to Exmo_20 being an adjacent and supporting foraging habitat.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Given the points raised above , I feel strongly that at the current time, EXMO_20 should be removed from

the current plan, and that access for the scale of the proposed development is NOT appropriate from the limited access points (B3179 and Southern Wood) proposed. In the future, where landownership may change and access to proposed site may change it may be appropriate to reconsider- BUT - equally , because of the other points raised which contravene local policy, the scale of the proposed site needss to be smaller.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Christine Hadley

Full name: Christine Hadley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The EXMO 20 development is adjacent to the National Landscape and the Pebblebed Heaths (SAC/SPA) and will or is more than likely to have a detrimental effect on these valuable national assets. The proposed development is contrary to policy PB01. It would increase light pollution dramatically and the additional noise will affect the peace and tranquility of area. This will have a detrimental affect on wildlife, trees and hedgerows. There would be an increased to the risk of flooding to the lower lying land in conflict with Policy ARO1B The increased car use will result in congestion getting to the town centre, on the nearby minor roads and the B3176. The infrastructure for sewage disposal is already overwhelmed and is not coping. This problem needs to be redressed before any plan for 700 new homes can be considered in any part of Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Christine Hadley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The EXMO 20 development is adjacent to the National Landscape and the Peblebed Heaths (SAC/SPA) and will or is likely to have a detrimental effect on these valuable national assets. The proposed development is contrary to policy PB01. It would create a dramatic increase in light pollution and noise affecting the peace and tranquility of the nearby wildlife and be detrimental to trees and hedgerows. There would be an increased flood risk on the lower lying land in conflict with Policy ARO1B There would be increased car use and resulting congestion getting to the town centre. The infrastructure for sewage disposal is already overwhelmed and not coping. This needs to be redressed before a plan for 700 new homes can be considered in any part of Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

paul haestier

Full name: paul haestier

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: the access point is closer to budleigh than exmouth. this will cause extra strain on the budleigh services, which are struggling to cope now. additionally, the extra strain on the overloaded sewage system, that cannot cope with then infrastructure as it is. Yet more polluted beaches. the additional traffic this will bring to the B3179, will cause more pollution, and cause chaos on that road. not to mention the environmental devastation to the pebblebed heath.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: THIS IS A RIDICULOUS PLAN THAT SHOULD NEVER HAVE BEEN CONSIDERED

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Suzanne Hales

Full name: Suzanne Hales

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

1.12

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: Local communities have not been consulted enough and why does it say that Neighbourhood plans may be superseded by developers.

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All existing parishes and communities will have had full consultation and local knowledge will be taken account of.

3. Do you consider that this part of the Introduction chapter is sound?: No

Full name: Suzanne Hales

Proposal: 17. Implementation and Monitoring

1. To which part of the Implementation and Monitoring chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph or policy number that your representation relates to.: 17

2. Do you consider that this part of the Implementation and Monitoring chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Implementation and Monitoring chapter is not legally compliant. Please be as precise as possible.:

No enough detail about how design is monitored and implemented, housing should look like surrounding communities. NO MORE CREAM BOXES EVERYWHERE

2(c). Please set out the modification(s) you consider necessary to make this part of the Implementation and Monitoring chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Implementation and Monitoring chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Each development should have a design manager overseeing the construction and landscape. Ensuring quality homes for people to live in .

3. Do you consider that this part of the Implementation and Monitoring chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Implementation and Monitoring chapter is not sound. Please be as precise as possible.: More detail

4. Do you consider that this part of the Implementation and Monitoring chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Suzanne Hales

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.9

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: The housing figure not correct, where do these come from? If that many houses are built without new roads , train lines etc the county will come to a holt. New housing is not properly joined to employment sites, it will require people to drive everywhere.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

Full name: Suzanne Hales

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I am writing this as a resident , I have been Chairwoman of Clyst Honiton Parish Council for nine years. These are my comments about the latest EDDC local plan. I live in Clyst Honiton and would like to voice concern about the site decided for another new town. We are not opposed to a new town but the area is not the right one , land the other side near Greendale and Woodbury is a better option, but would still need better road planning. The topography of the site that had been chosen is ridiculous , its hilly ,wet and the roads around it are narrow and always snarled up. At no point have Clyst Honiton been asked or consulted about the new town-IT IS IN OUR PARISH! Not once have EDDC or any councillors attended a Parish council meeting. It's like we don't exist. We could help. Clyst Honiton has been dumped on so many times. We've had skypark, science, Park Lidl, Amazon, DPD , land taken by Cranbrook and Skypark, a giant phone mast stuck at the bottom of our village, and to add insult to injury jury a warehouse was granted permission by government to be built in the village! We tried to plan an NDO for our village to provide housing for our village and a community building , we have had thousands of pounds in grants. we are met with constant obstacles from Highways, Exeter airport and other bodies. Highways allow access for developers onto the old A30 but not access onto the Clyst Honiton bypass for our site.

The consultation for the new town at Westpoint has not been useful to residents. We have local knowledge of the proposed area for the new town. Comments included, No clear route to join the town to facilities, The map shown did not show all the hills and streams that would need to be travelled . For a so called sustainable town access around it was poor. No new roads were shown, The bus route seemed to stop halfway though the town. Residents would have to go miles around the town to get to the other side of it. My other concern is that the plan seems rushed and not thought through properly.

Full name: Suzanne Hales

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

The new community has not been consulted on properly. The topography of the site is wrong its hilly, wet, and has not been thought through properly.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It should say a new community is being considered but the area has not been decided. The plan is not robust no local knowledge has been used from the consultation

3. Do you consider that this part of the Development at the West End chapter is sound?: No

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Communities and Parishes have not been included in decisions on placement of new town

Sarah Hales

Full name: Sarah Hales

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 in Exmouth (and other developments) will be in conflict with Paragraph 11.2 as it will definitely increase the need for car travel and cause increased traffic congestion both around Exmouth and Budleigh and through the villages along the insufficient road network to and from Exeter. Most of the people in these 700+ new homes will work outside Exmouth, as it will not provide sufficient job opportunities, and Exeter will be their main destination. Exmouth train station will be nearly 4 miles away from Exmo_20 so not at all accessible and the cycle track similar distance away after cycling up and down a steep hillside. Thus is contrary to POLICY TR01.

A recent email to our MP David Reed regarding the poor road network between Exmouth and Exeter and beyond got this reply Thank you for your email about the likelihood on increased traffic movements through Woodbury and surrounding villages.

I asked Cllr Richard Scott (Devon County Council with portfolio responsibility for Highways) for his views and he responded as follows:

There are no plans for any major infrastructure improvements after the Dinan Link. The current local plan does not provide for any nor does the proposed new local plan for housing. EDDC took the decision to separate its new proposed local plan, first dealing with housing and infrastructure after, our view is this is a huge error.

It will be a 'huge error' to continue to develop Exmouth without considering the road access. Exmouth is on a peninsular with very limited roads, where as many other East Devon towns have dual carriageways nearby and a much more developed transport system.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Councils cannot consider increasing housing without assessing the wider infrastructure especially around road access and congestion concerns to and from each development.

Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Suzanne Hales

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: My next comment relates to work done by local parish councils to protect green wedges. We spent hours trying to protect Whimble and Rockbeare from joining up with Cranbrook. THE ORIGINAL LOCAL PLAN SAID IT WOULD PROTECT AND SUPPORT EXISTING VILLAGES. Now Whimble 08 site has been put forward for 50 houses. - Whimble Parish Council have sent an excellent response to this awful idea, please look at what they have written - again with local people's knowledge and comments in the minutes of their meetings. No proper consultation with residents in Whimble had been conducted. The wildlife in Whimble 08 is the last area for animals, birds and reptiles to be safe in- all the land before it is taken by housing. THIS SHOULD BE A DEFINITE GREEN WEDGE TO KEEP EXISTING ANCIENT COMMUNITIES SAFE FROM CRIMEBROOK. The land in this area is some of the best farm land in Devon for growing, Our children will ask us in the future why we don't have sustainable locally grown food because we let all the land be built on. Why Does East Devon need so much housing where is the evidence? I realise that housing needs to be provided but it's not good housing that has gone Up, it's not quality of life housing. None of it is in keeping with nearby communities. I have handed in my notice as a councillor because whatever we do or say is never listened to. Everything we commented on about Cranbrook has now come true. The developers rule and do what they want.

Full name: Suzanne Hales

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This was to be a protected green space to separate Cranbrooke from Whimble. Many local Parish councils spent hours working to protect green wedges between Whimble and Rockbeare from the sprawl of crimebrook . When do EDDC ever say no to numbers given by government, we have more than our fair share of new housing in East Devon. Beautiful farmland destroyed, where will all our future sustainable food come from . Sick of how you are allocating land.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This was to be a protected green space to separate Cranbrooke from Whimble. Many local Parish councils spent hours working to protect green wedges between Whimble and Rockbeare from the sprawl of crimebrook . When do EDDC ever say no to numbers given by government, we have more than our fair share of new housing in East Devon. Beautiful farmland destroyed, where will all our future sustainable food come from . Sick of how you are allocating land

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Not enough consultation with local communities. The original EDDC plan promised to protect local communities and villages.

Full name: Suzanne Hales

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN09

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Consultation with neighbours is key to where how and what areas are used for travellers sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

LesleyAnne Hall

Full name: LesleyAnne Hall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 for housing allocation should be selected, one which was deemed available , achievable & suitable in the HELAA. Exmo_20 would cause harm to the adjacent Pebblebed Heaths. (SSS1/SAC/SPA/NNR) due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to the HELAA, the site Selection Methodology & POLICY PB01 of the local plan & not in accordance with the Mitigation Hierarchy to select avoidance over mitigation. The proposed development is in conflict with POLICY OL09 & POLICY PB04 as the Habitats Regulations Assessment (30.01.25) states that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to “air quality“ (ED Pebblebed Heaths SAC/SPA) such that the plan fails the integrity test. The main site access proposed is opposite the SAC/SPA. Development of Exmo_20 on heavy clay subsoil with ineffective soak ways would exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth, which is already under additional pressure from climate change. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel, contrary to figure7 - the energy hierarchy & increase traffic congestion , in conflict with PARAGRAPH 11.2. The isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services & facilities , contrary to PARAGRAPH 11.6 . It is too far & too steep from any town centre to use walking or cycling as their choice of transport . This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access via Southern

Wood on to Meadow View Road would be absolutely inappropriate. Meadow Biew Toad is already fairly congested with cars parked on the road & an increase in traffic from the proposed development would cause mayhem along this road , specifically at commuting times & especially when trying to access Dinan Way. It would be an “accident waiting to happen”

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Susan Hall

Full name: Susan Hall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Exmo_20 proposed development will cause harm to the Pebblebed Heaths (SAC/SPA). It will be contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Developing Exmo_20 would isolate habitats and destroy wildlife corridors, contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to Paragraph 13.9 of the Local Plan.

The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to....air quality (East Devon Pebblebed Heaths SCA/SPA). Exmo_20 is in conflict with Policy OL09 and Policy PB04.

Exmo_20 would destroy the tranquillity, wildness and dark skies of the countryside, which is contrary to Policy OL01.

Exmo_20 would adversely affect St John in the Wilderness Grade 11* listed church and churchyard, drastically altering its current peaceful setting. This is contrary to Policy HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would increase the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with Policy AR01B.

Exmo_20 would vastly increase the need for car travel and would therefore increase traffic congestion, in conflict with Paragraph 11.2. It is therefore unsustainable development. Its isolation would necessitate people travelling much further than 800m to access existing key services and facilities, contrary to Paragraph 11.6. It is too far from any town centre for people to use walking or cycling as their choice of transport, especially in view of the steep gradients and lack of pedestrian footpaths which would make this difficult and hazardous. This is contrary to Policy TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (shops, doctors, school, beach etc) would be the obvious choice for residents of Exmo_20. This would result in coalescence of Budleigh and Exmouth, contrary to Policy OL05 of the Local Plan.

The views from the SW Coastpath and the approach to Exmouth and Budleigh via the B3179 would be seriously impacted, both for residents and a large number of visitors, and would further erode claims that this area is an AONB.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan. There is no way this can be described as a 'development' of either Exmouth or Budleigh Salterton, as it is too far removed from both.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Carol Hall

Full name: Carol Hall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

HONITON GROWTH - EMPLOYMENT The amount of employment land proposed (14.6ha) in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers. In relation to employment land, it is inevitable that the continuing development of high quality employment opportunities at Cranbrook, the second new settlement, Skypark, Exeter Science Park, the Enterprise Zone and other employment developments in proximity to the M5 will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 14.6ha of employment land at Honiton. Allocation Reference Gitti_03 and Gitti_04 I OBJECT to these allocations. The reasons are summarised as follows:

- This has been an allocated employment site for in excess of 15 years and remains undeveloped. There are clearly viability issues which so far have proved to be insurmountable. If the site cannot come forward within the plan period for development, then it should not be allocated.
- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development
- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two designated National Landscapes (NL) formerly The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation

- Although the Otter valley west of Honiton including the allocation site is not in itself within an NL, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 14.6ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 14.6ha
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 14.6ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 14.6ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL I OBJECT to the proposed allocation Gitti_05. The reasons for this objection are summarised as follows:

- The allocation clearly does not meet sustainability criteria;
- The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
- Development will have a detrimental visual impact on the designated National Landscape, formerly the East Devon AONB and on the setting of the NL;
- Vehicular access to this allocation is only available via Devonshire Road and it is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate. The combination of additional

employment and residential growth to the west of Honiton being accessed via Devonshire Road will be detrimental to public safety.

- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety. Outside of the development there are no pavements or public footpaths except for one on the other side of the village. There are minimal opportunities for exercise or leisure on foot or bicycle in any part of the parish;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Development of Gitti_5 would fail to meet your sustainability criteria. The town centre services together with the railway station, the hospital and doctors surgery are located for both vehicle and pedestrian travel at distances between 3300m at best and 3900m at worst. Your sustainability criteria advise a distance of no greater than 1600m. The distance to the Community College is even greater and the nearest primary school between 2800m and 3400m. The further west you move into the site the greater the distance becomes. The nearest supermarket (Lidl) will be between 1600 m and 2200m. The inevitable consequence of this will be multiple car movements contrary to your sustainability objectives and policies. This is not a sustainable site for residential development and is contrary to your sustainability objectives.
- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community. There is a village hall in the centre of Gittisham village but residents of

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Hayne Farm usually drive to it as it is too dangerous to walk or cycle along the narrow, busy lane.

I am a resident of Gittisham Parish and have lived in the centre of the village for 26 years. I am married with 2 children, who were born here. I have always been actively involved in the village, with the church, the village hall, the playground and the Parish Council. I work from home and I am a civil engineer, previously working in flood defence at the Environment Agency for 20 years. My leisure time is spent walking and running in this area, where I very much appreciate the beauty and peace of my surroundings.

Mavis Hall

Full name: Mavis Hall

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

- In previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.

- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

- Not everyone has, or can access this form thus making the process undemocratic.

- I object strongly to these developments particularly the way the undemocratic decision is being made. Residents and the local councillors should play a significant role in the decision process.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of

the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.

- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- The FAS work being undertaken at present is untested and it is uncertain that it will be sufficient to cope with the water and drainage for at least a further 100 houses.

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.

- Lack of adequate public transport. Few buses and unreliable and expensive rail service
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- The small lanes around the village are inadequate to cope with the amount of extra traffic these developments will create.

Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade. Where are the children to be educated, surrounding schools are also near capacity.

- The NHS hub in Ottery St Mary is struggling to meet the needs of the existing population of its surrounding villages, including Feniton.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.

- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.
- There is a downturn in the construction industry, the availability of building materials is in question, unless imported, there is also a shortage of skilled labour. Acland Park is not finished due to issues with the building company leading to vandalism, rats and dumping of waste-this is something that needs to be avoided in other developments.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. The blind bends on either end of this lane are especially dangerous.
- The land is sustainable farmland which is much needed.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.

- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

- Removal of Feni_08 from the draft local plan
- Removal of Otry_20 from the draft local plan.

Richard K Halstead

Full name: Richard K Halstead

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could not and should be located on an alternative site where it would cause less or no harm to the Pebblebed heaths (SAC/SPA/ NNR). Developing Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01

A number of rare or endangered species are at sites very close to the proposal.

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the local plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects on integrity in relation to ...air quality (East Devon Pebblebed Heaths SAC/SPA. Exmo_20 is in conflict with POLICY OL09 and Policy PB04

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. The creation of hard surfaces and drainage would put more pressure on the South West Water infrastructure. This is in conflict with Policy AR01B

The main highways access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, Meaning that it would be more associated with Budleigh Salterton in terms of its accessibility and put increased pressure on the smaller towns infrastructure, services etc. This would be a catalyst for the towns loss of identity with the inevitability it would become (coalescence) a suburb of Exmouth in the long term.; contrary to POLICY OL05 of the local plan.

Exmo_20 would increase car travel and increase traffic congestion, with impact on settlement of Woodbury and the environment over the Pebblebed Heaths. The existing roads are unsuitable for a significant increase in traffic. Any highway improvement as would impact significantly on the status NNR/SAPSAC) of the area in terms of tourism, peoples recreational enjoyment and wildlife contrary to POLICIES) L01, PB01, PB 04, 90. Policy – Due consideration of protected and notable species

The site is too close to the NNR which recognises the importance of the heath locally and National. The site is too close to the boundary of the National Nature Reserve. Exmo_20 would have Significant implications for the nature and wildlife contrary to 88. Strategic Policy – Local Nature Recovery Strategy and Nature

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan Any Development should be accessed from Exmouth. Do not access the eastern side of Exmouth directly onto the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

will halwyn

Full name: will halwyn

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: I would like to see the policy strengthened and take into account the rural nature of the area, with support for retaining safe pedestrian/cycle interconnectedness of villages; Where minimal traffic routes are used to connect villages to surrounding resources or communities these should be identified and development should not be allowed that would increase traffic along these routes and result in the loss of the freedom of movement otherwise afforded.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Interested.

Full name: will halwyn

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: I would like to vouce strong support for passing loops on the railway line.

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: I would like to see the feniton to ottery cycle route scheme included in the plan as this would have significant transport interconnectedness benefits, giving ottery residents car-free access to the waterloo railway line.

Full name: will halwyn

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Table 1

3. Do you consider that this part of the vision chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: broadly in support, in particular objective 1 and 2 , 8 and 9.

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: I do feel there should be a principle of proportional development; I.e. that one shouldn't double the size of a settlement in a short period of time, and that where such quantities of housing are needed, well planned new towns or villages are better than "bolting on" houses where amenities are not proportionate.

I do also feel there should be an emphasis on using existing brownfield sites and protecting our farmland and natural spaces where possible.

Anissia Halwyn

Full name: Anissia Halwyn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: My comments relate to Strategic Policy SD18: Development allocations at Feniton and cover the following issues: -

- Surface water flooding – Feniton is vulnerable to significant surface water flooding, which is generated due to a combination of run off from poorly managed agricultural fields and the existing expanse of non-permeable tarmac and concrete within the village. Surface water flood risk has not been made viewable on the interactive map. Whilst works are taking place to alleviate some of this pressure, the scheme has not been completed nor monitored yet so it is unclear how effective it will be. The flood scheme has presumably also been designed with capacity to alleviate flooding based on the current village extent and therefore the current maximum potential surface water volumes, potentially incorporating climate change projections. Adding to the urban creep of the village onto greenfield sites would inevitably increase surface water runoff. This would especially be the case where there is a disproportionate increase of residential area such as at Beechwood (Feni_08), which would convert well-managed, permeable farmland into a large expanse of tarmac and concrete. This has the potential to increase flood risk within the village. Instead of building on permeable green areas and farmland, we should be aiming to conserve and sustainably manage these areas to improve surface permeability.

- Traffic – Residential and industrial development will lead to an increased volume of traffic in the village, which is only accessible via small country roads. Access to Feni_08 and Otry_20 is via a narrow, single laned road with two humpback bridges (with

blindspots due to steep gradients) – these sites would not be safely accessible on the existing roads, especially when considering the significant increase in traffic. Increased congestion on many of the roads around Feniton, including Ottery Road, will be inevitable due to them being narrow country roads. This will also make the roads become even more unsafe to cycle and walk on. In TR01 it states that “New development (specifically including where land is allocated for development) should facilitate access to high quality public transport through its location, layout..... development should be aligned with Devon County Council’s Bus Services Improvement Plan ” – Feniton currently only has one infrequent bus service to Sidmouth and none to Exeter, and is not considered for improvements within DCC’s BSIP. In addition, the rail service to Exeter/Waterloo is two hourly and cancellations/delays are commonplace due to problems posed by the single line between Pinhoe and Axminster. Travelling by car is therefore, unfortunately, the default option for the majority of residents in Feniton, as options are limited otherwise. As a result of the flood alleviation scheme, Kier have stated that there will be an increased risk of flooding of the road out of Feniton at Patteson’s Cross. Ottery Road was recently closed for works, which led to chaos as large volumes of traffic were diverted onto the (even) smaller roads towards old Feniton and Talaton, causing significant congestion. It is almost certain that this issue will re-occur in the future due to flooding at Patteson’s Cross –increased volumes of traffic would significantly exacerbate the problem.

- Travelling by foot/cycle – In TR01, it states that “Development which would result in the loss or reduce the convenience or attractiveness of an existing or proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided.” In the draft LCWIP, the Otter Trail linking Feniton with Sidmouth was proposed to be an on-road route. Roads around Feniton are already not the safest (due to the points above), especially for children cycling to secondary school in Ottery, but increased traffic due to the developments would most definitely compromise the safety and ultimate useability of the on-road Otter Trail. The site opposite Bridge Cottages (Otry_20) is adjacent to one of the only footpaths in the village, which is a large orchard – very beautiful all year around and excellent for wildlife spotting. The industrial development will significantly reduce the attractiveness of this right of way.

- Biodiversity – Being in a rural location, Feniton is a hotspot for wildlife. This is evident in the surrounding fields – it is commonplace to see deer, foxes, birds of prey and many more species making use of the available green space and agricultural fields surrounding the village. The proposed developments would reduce this available (supporting) habitat, with the proposed development at Beechwood and Bridge Cottages in particular having high potential to cut off valuable habitat corridors between the surrounding countryside and remaining green spaces in the village. The statement under the Beechwood development, that “Careful designed and implemented boundary treatment on the eastern side of the site will be required to form a soft edge to the

countryside beyond” will do nothing to mitigate this significant issue and should be considered a greenwashing exercise.

- In the Biodiversity and Geodiversity chapter, it states in para 13.39 “Trees, woodlands, and hedges are vital for enhancing landscapes, providing wildlife habitats, supporting sustainable drainage, sequestering carbon, and improving public health.”. The site at Otry_20 is an orchard, which is not only likely to contribute to habitat connectivity, but also contributes to landscape character due to the region’s important history of hosting extensive orchards.
- Infrastructure – Feniton does not have adequate infrastructure to support further development. I have already mentioned factors such as the state of the roads and the railway, but an additional factor is the small size of the school, which is working at full capacity and would not be able to accommodate an increase in numbers.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The proposals to develop on greenfield sites within Feniton do not align with the following policies:

- Policy TR03: Travel plans, transport statements and transport assessments
Where development is likely to generate significant amounts of vehicle movements, planning permission will not be granted unless they are supported by a transport statement or transport assessment, and subsequent travel plan, that identifies measures to secure new sustainable travel arrangements, taking into account: A. The scale of the development; and B. The availability of public transport, walking and cycling opportunities; and C. Proximity to environmental designations; and D. Cumulative impacts of other development in the area; and E. Whether there are particular types of impacts that require further evaluation.
- TR01 p3 Walking, wheeling, cycling and public transport should be the natural first choice for short local journeys, or as part of a longer journey. Walking and cycling

routes must be prioritised in new development (specifically including where land is allocated for development) – such routes should be coherent, direct, safe, comfortable and attractive.

New development (specifically including where land is allocated for development) should facilitate access to high quality public transport through its location, layout, and, where necessary, contributions to public transport services and/or facilities (for example, bus services, bus stops, bus priority measures, rail infrastructure). In particular, development should be aligned with Devon County Council's Bus Services Improvement Plan

Development which would result in the loss or reduce the convenience or attractiveness of an existing or proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided.

- Policy PB08: Tree, hedges and woodland on development sites Retention of existing trees and hedges Where trees are present on a development site proposals will need to be designed, and schemes implemented, in a manner that retain good quality and healthy woodland, trees and hedgerows. This is to specifically include protection of : ancient woodland; ancient and veteran trees; those with visual amenity value; those that support wildlife (such as some appropriate U category trees as part current BS 5837111) or provide habitat connectivity; those which positively contribute to local landscape character, the historic environment or the significance of a heritage asset and its setting; and rare or unusual species of trees. These protected assets will need to be incorporated into the overall design and landscape scheme, within public spaces where possible

- Policy AR01: Flooding

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The proposal to develop opposite Bridge Cottages is within

the Ottery ward, despite clearly being in Feniton. I am concerned that objections to any future development from Feniton Parish Council and residents will not be adequately considered, due to the boundary issue. Any development at this location has the potential to negatively impact residents in Feniton, due to the conversion of a biodiverse orchard to industrial buildings, impact on the adjacent public right of way and impacts on traffic volumes due to the poor connectivity via sustainable transport between Feniton and Ottery and surrounding villages.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: will halwyn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I am concerned that the drainage and flooding issues in the village are not sufficiently considered which will cause damage to existing properties.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

The topography of new feniton as a whole is a shallow bowl, without natural drainage and relatively little drop for sewerage and drains. This has caused problems with surface water and sewage in the village. There is currently a scheme in place to try to reduce this for the worst affected properties. It seems concerning that edcc is keen to push ahead with development before the effects and effectiveness of this scheme can be observed. Kier have stated that it will likely increase flooding in other areas i.e. roads in and out of the village. I feel it is somewhat cynical to try to push development through before any further issues can be observed. Fenitons flooding and sewage issues were recently mentioned in parliament, with effluence flowing into the ditches in peoples gardens; this is not a system with spare capacity. In the case of feni-08, there have historically been issues with flooding into adjacent land from runoff when this field was poorly managed. Sewerage and drainage on green lane properties is old, and unable to deal with further input. For both feni-08 and otry-20; Green lane is a rural lane which forms the pedestrian, cycle and horse connection between the new and old village, and allows access to two footpaths. This lane should be preserved and enhanced as a community amenity, for active transport and recreation. The lane includes two humpback bridges and does not have pavement. Increased traffic on this lane will result in danger to inhabitants who are using it for active transport i.e. school runs, exercise,

commuting, and thus encourage further unnecessary car usage. There is a plan to link feniton to ottery through a cycle route along the old railway line which joins to green lane, and so it should be planned to form part of a wider safe-cycle network in devon, rather than encouraging further car obstruction these rural lanes.

In the case of all development in feniton; it is optimistic to think the railway will absorb all traffic; it is used by a minority of residents, and reliability needs to be improved. Feniton has almost no bus service. Therefore in feniton and surrounding villages it must be assumed that many journeys will be completed by road. This leads to the risk that the villages in this area become cut off from surrounding green space, and active transport to surrounding villages due to the increased risks in the lanes.

Amenities; GP service are in ottery (poor access by car) and are oversubscribed.

I feel that the proposed developments in feniton contradict the objectives set out in the vision. I do also feel that there should be a principle of proportional development of any settlement, to allow the effects to be seen, rather than the glut of proposals that seem to be targeting feniton in a short time should be taken.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of feni-08 and otry-20. Green lane to be included as part of a wider safe active travel network.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I feel that the glut of proposals before the effects of the flood scheme can be measured is cynical.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to participate.

Full name: will halwyn

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: I believe that if we are to justify the loss of farmland and natural environment by any greenfield site usage, there should be safeguards that these new developments should not be purchasable as second homes or holiday lets. I do also believe that as part of housing needs policy the council should be taking these housing losses into account as they do significantly impact the area, particularly the rental sector.

Full name: will halwyn

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: I feel the percentages of affordable housing seem low. If we are to justify the loss of farmland and natural environment it should be for necessity.

Kerin Hamill

Full name: Kerin Hamill

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL01

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.: The aims of the policy are not being met as important landscape features will be built on and hidden from view. The key objective to the plan is not being met if EXmo 20 goes ahead. There cannot possibly be any enhancing of the environment, landscape, historic character, archaeological value, wildlife, agricultural and natural resource value of countryside areas. Has the District Landscape Characterisation Assessment and the council's tree strategy been referred to maintain and enhance local distinctiveness and landscape character. Furthermore 12.6, ABC, 12.7 12.8, 12.12 D, 12.15, 12.16 will not be adhered to. 12.28 says that light pollution where light overspill from street lights onto areas not intended to be lit, particularly in areas of open countryside and areas of nature conservation value should not be polluted. If we are to keep our dark skies then lights from houses, gardens, security lights in proposed EXMO 20 cannot provide this alongside street lighting.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: As above. It totally contravenes its own policy

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I cannot think of any way that could possibly allow light spill to mitigate this.

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The strategic plan is at complete odds with building anything on EXMO20

Full name: Kerin Hamill

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL01

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.: The policy ensures that development proposals preserve the visual integrity, identity and scenic quality of East Devon by conserving key views and landmarks. The plan for the field to be used for EXMO 20 totally goes against this.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: It does not enhance anything in the field to preserve the views

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.: A housing site on this piece of land containing 700 houses and 2 hectares of employment land will totally go against OL01.

Full name: Kerin Hamill

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL01

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.: If these areas have the highest level of landscape protection and are designated by the Secretary of State, it means their boundaries and statutory protection cannot be altered through the local plan process 12.7. D. If light intrusion is spilled onto areas intended not to be lit, particularly in areas of open countryside and areas of nature conservation value then this part of the policy would be broken. F. There will be pollution of sites of wildlife value if building goes ahead. 12.7 These areas of National Landscapes have the highest level of landscape protection and are designated by the Secretary of State, meaning their boundaries and statutory protection cannot be altered through the local plan process. EDDC has moved boundaries to create the EXMO_20 plan.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: boundaries have been changed

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This chapter goes against EDDC's plan and methods

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: so far no one from the council is listening

Mr John Hamill

Full name: Mr John Hamill

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB04

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: The Plan is not sound due to the inclusion of Exmo_20. This site would rely on the B3179 as the only access & egress route for traffic to and from Exmo_20 referred to in Strategic Policy SD01. This proposed development impacts directly the soundness not only of PB04 but also on Strategic Policy PB01 - "Protection of internationally and nationally important wildlife sites". Had even one member of the Strategic Planning Committee bothered to look at this site it would be obvious that the B3179 cannot safely accomodate the extra and excessive traffic that the construction of 700 houses and 2 hectares of Employment Space must generate. It is inevitable that this development, should it be allowed to proceed will have an adverse impact on both the landscape and biodiversity of the local environment and in particular on the Pebblebed heaths

4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There is no evidence that EDDC has adequately consulted with National Landscapes with regard to Exmo_20 as required by 2.4 of the East Devon Local Plan - Key Supporting Documents 002. It is also noted that, as documented in the referenced document and recorded in the minutes of the Strategic Planning Committee (SPC) meeting of 5/9/2023 that Budleigh Salterton Town Council (BSTC) was not included in the Duty to Co-operate despite EDDC undertaking in their Statemant of Community Involvement (p16) to consult all Town and Parish Councils.... Since the meeting of 5/9/2023 Exmo_20 was determined as "unsuitable" by EDDC and as late as 2/9/2024 the site was scheduled "Not Allocated". Somehow it is now proposed and adopted by the SPC as suitable and "Allocated"! It is patently obvious that a development of this size and impact within a few hundred metres of Budleigh and less

than 2 miles from the centre of the town, located on the edge of the National Landscape should have resulted in detailed and meaningful discussions with both BSTC and the residents of the town.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I don't think you have the right to ask this question. I clearly qualify as below from the Planning Inspectorate Procedure Guide 28/8/2024:

3.10. The right to appear and be heard by the Inspector at a hearing session is limited to those persons defined in section 20 (6) of the PCPA i.e. any person who has made a representation seeking a change to the plan within the deadline set by the LPA for Regulation 19 consultation responses. (This includes anyone seeking a change to the addendum of changes to the plan, if the LPA have submitted one in accordance with the procedure described in paragraph 1.5 above.) The Inspector may invite any other person to attend a hearing session if, in the Inspector's view, their participation will assist in assessing the soundness of the plan. But the Inspector has no power to summon a person to a hearing. In addition to the above I have been trying to be listened to by EDDC for many months without any success at all, therefore wish to speak directly to the Inspector.

Full name: Mr John Hamill

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.1

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: Exmouth is classed as a tier 1 town but is wholly unsuitable for large growth as detailed in this Plan. It is on the southern edge of the peninsular wedged between the River Exe and the coast, thus making 360 degree development impossible and the large amount of sprawling development built over the last years has effectively strangled the town. It has already doubled in size since the 1960s and cannot sustain further development on the scale envisaged, at best some infill may be possible.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Exmouth is classed as a tier 1 town but is wholly unsuitable for large growth as detailed in this Plan. It is on the southern edge of the peninsular wedged between the River Exe and the coast, thus making 360 degree development impossible and the large amount of sprawling development built over the last years has effectively strangled the town. It has already doubled in size since the 1960s and cannot sustain further development on the scale envisaged, at best some infill may be possible.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : Having attempted over a period of months to be heard by EDDC I would like the opportunity to put before the Inspector the inadequate "consultation " process undertaken and the rejection by them of any reasonable objections to their pre-conceived ideas

Full name: Kerin Hamill

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: Exmouth is on a peninsula and although classed as a tier 1 town it is totally unsuitable for large growth. The southern part is the town centre and , therefore, making a 360 degree development is unsuitable. The existing development is already a long way from the town centre.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Exmouth is on a peninsula and although classed as a tier 1 town it is totally unsuitable for large growth. The southern part is the town centre and , therefore, making a 360 degree development is unsuitable . The existing development is already a long way from the town centre.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : We were not consulted at the first stage of this plan and it went through without residents being informed. We were not listened to for the second consultation and I would hope that at this stage we can hear what the Inspector has to say.

Full name: Mr John Hamill

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP03

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Budleigh Salterton Town Council (BSTC) has not been consistently engaged in the processes of EDDC which is in direct conflict with EDDC's Statement of Community Involvement published on their website. P16 states: The Town and Country Planning (Local Development) (England) Regulations 2012 require the Council to consult the following 'specific' and 'general' consultation bodies if proposals in planning policy documents affect them. A number of these bodies are also considered to be Duty to Co-operate bodies. It is important to note that the Neighbourhood Planning (General) Regulations 2012 (schedule 1) also requires qualifying bodies to consult the same consultation bodies in the preparation of Neighbourhood Development Plans. In instances where any of the organisations (bodies) detailed below cease to exist, successor bodies will be consulted. In the bodies annotated to this statement are: -Town / Parish Councils - ? All Town and Parish Councils within and adjoining East Devon District. By completely ignoring BSTC, EDDC have failed their own policy and thus the Duty to Co-operate requirements of the Regulation 19 Consultation. Not only does EDDC have the Duty to Co-operate with Organisations but also an obligation to ensure development is viable, for example infrastructure such as effective sewage removal and processing and the capacity and safety of Highways. It is not clear that Devon County Council, the Authority responsible for Highways, has been properly consulted. It would appear to be obvious that infrastructure should be capable of handling any future development which can only be achieved by proper consultation with the relevant Authority. EDDC has failed to do this.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : Having tried to be heard by EDDC for many months I would like the opportunity to speak before the Inspector

Full name: Kerin Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

ExMO_ 20 would have a dire effect on nearby wildlife sites and destroy the wildness, dark skies and tranquility of the countryside contrary to POLICY OL01. The proposed development is in conflict with the Strategic Nature area 368. It will fragment and isolate wildlife corridors contrary to Paragraph 13.23 of the local plan. This development will cause harm to irreplaceable habitats, veteran trees with TPO's and species rich hedgerows. This proposed development would be built on a very heavy subsoil and the rainwater run off would meet the Withycombe Brook through Exmouth which would cause excessive flooding. Removal of the trees at the bottom would prevent water being absorbed. This is in conflict with POLICY AR01B.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To have a voice of reason.

Full name: Kerin Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed site is extraordinarily beautiful. It is countryside that should not be lost forever and turned into urban sprawl. This will increase the need for more traffic on the B3179, which is quite a busy route. Getting out from Dalditch Lane is dangerous, but add thousands more cars and it would be impossible. The fumes from extra cars (which the government wishes to reduce) will be considerably worse and will have an unhealthy affect on residents, wildlife and the Pebblebed Heaths. This can never be mitigated! This is in conflict with Paragraph 11.6. It is too far and too steep from any town centre to use walking or cycling as a choice of transport. Nor is it safe to do either on the B3179. this is contrary to POLICY TR01.

Full name: Kerin Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: An alternative site to Exmo_20 should be found, one which was deemed available , achievable and suitable in the HELAA. EXMO_20 will cause damage to the nearby Pebblebed Heaths (SSSI/SAC/SPA/NNR) due to EXMO 20 currently being a supporting foraging habitat. Developing EXMO 20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. The plan would cause damage to a Grade 11 heritage asset being St John in the WILDERNESS. There is a beautiful, peaceful setting for this church and burial ground which would be drastically altered with hundreds of houses around it. This is contrary to POLICY HE02.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because EDDC has not listened to all the points raised

Full name: Kerin Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: the main entrance and exit is closer to Budleigh than Exmouth and this will bring more people into Budleigh which already has its own building projects proposed. The town will lose its character and the small infrastructure which exists will be over run. It is already extremely difficult to get a doctor's appointment and this problem will be exacerbated by the addition of another 4000 people. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth contrary to POLICY OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove EXMO _ 20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Because EDDC has not listened to the many objections, nor have they consulted from the outset, therefore, speaking to the Inspector is crucial.

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These comments refer to Chapter 5 of the Plan as indicated on the Commonplace platform. Allocation of Exmo_20 would be in conflict with POLICY PB06, as the SNA 368 is currently being finalised as being allocated as part of Devon's Nature Recovery Network under the Local Nature Recovery Strategy in accordance with the Environment Act 2021 - due to it's biodiversity, importance as a supporting foraging habitat and wildlife corridor between the coast and the Heath. There are alternative locations for housing within the EDDC area on sites which have passed the HELAA assessment (NB Exmo_20 Failed), but due to the relevance of the location of the SNA 368 for the local natural environment it cannot be relocated elsewhere. The LPA does not appear to have taken this into consideration regarding the proposed Allocation of Exmo_20. The Exmo_20 Allocation is therefore not justified nor consistent with National Policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Other sites, which did pass HELAA and were 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.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These comments refer to Chapter 5 of the Plan as indicated on the Commonplace platform. The Plan is not sound because Exmo_20 was determined to be neither achievable nor suitable in the HELAA. The site as presented during the Regulation 18 stage was also not available, due to multiple land owners not being listed on the Agent's submission documents nor notified accordingly. The site, Exmo_20 is therefore not available, not suitable and not achievable. The NPPF states (para 72 in 2024 or para 69 in 2023 version) - "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and and likely economic viability." With regard to economic viability, taking into account the requirements for this site in terms of (i) Highways mitigation - upgrades will be required to significant parts of the B3179 & B3180 most notably the junction with Hulham Road. (ii) Pebblebeds Heath SAC/SPA European site mitigation - addressing the "inherent conflicts" (HRA 2025) regarding excessive nitrogen levels, in accordance with the Habitat Regulations (no mitigation strategy is yet proposed in the HRA), taking specific account of the onerous application of the Dutch Nitrogen case. (iii) Pebblebed Heaths SAC/SPA Eoropean site mitigation - addressing impacts regarding recreational pressures on the heath. (iv) Historical and archaeological mitigation - consideration for St John in the WILDERNESS church and the surrounding Saxon/Norman/Medieval settlement. (v) Wildlife consideration on site for biodiversity protection and enhancement (net gain). (vi) Primary School - there will be no school within the required 800m "walking neighbourhoods" distance for the majority of the site, so provision will have to be made on-site. (vii) secondary School - Exmouth Community College has no capacity to expand and is currently at or near capacity, so provisions will need to be made with associated contributions from developers. (viii) Community Infrastructure levy considerations. (ix) Affordable housing provision. (x) Net Zero housing

requirements. To ensure economic viability, the costs of any requirement likely to be applied to development should, when taking into account the normal costs of development and mitigation, provide competitive returns to a willing land owner and a willing developer to enable the development to be deliverable. As much of the information regarding the required mitigation (e.g. HRA 30/01/2025) and standards has been provided subsequent to the Allocation of this site on 03/09/2024, the economic viability has not been given consideration therefore the site allocation is currently not justified, effective or consistent with National Policy and is therefore Not Sound. It should be of concern to the LPA that the site is potentially not economically viable as, if so, it is not deliverable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Other sites, which did pass HELAA and were 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.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Dear localplan,

This is a comprehensive statement on the whole process undertaken with regard to Exmo_20 and is intended to draw your attention to the defects in your methodology. If Exmo_20 in it's present form gets through this Consultation it is my intention to draw all these points to the Inspector's attention at a later stage.

The following key points are a brief summary of the main evidence material which is contained within this document in relation to the EDDC Reg 18 and Reg 19 Consultations.

1. Based on the HELAA Report and the 'Site Selection Methodology' document in effect between May 2022 and December 2024, Exmo_20 should have failed the 'site sifting' stage of the site selection phase. So should not have been put forward for Reg 18, and therefore not available for Reg 19 either.
2. Exmo_20 has 'NEVER' been consulted on as a 'whole site', and is a totally different consideration. Once the decision was made to join Exmo_20a and Exmo_20b together to form Exmo_20 there are numerous other considerations that need to be discussed, yet have not been.
3. At the Strategic Planning Committee (SPC) meeting on the 9th August 2022, the developers presented site 'Land at St Johns' and agreed that ONLY the southern part of Exmo_20 was being put forward with 150 new homes suggested. The developers confirmed that the Northern part of the site was not being put forward for development. It should have been confirmed at this stage that this means that site Exmo_46 was being proposed!!

4. Site Exmo_46 should have been the only site associated with Exmo_20 that was taken forward from this date forward, as identified in all of the documents and evidence put forward for Reg 18.

5. At the SPC meeting on the 6th September 2022, the committee agreed to 'Recommend endorsement of the preferred sites and 2nd choice sites as suitable for consultation'. There is no mention of putting 'REJECTED' sites forward for consultation.

6. At the SPC meeting on the 1st November 2022 the committee agreed that 'Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content'. It is also at this meeting that two new site references Exmo_20a and Exmo_20b are visible on a map. It should be noted that these two new site references have never been discussed or consulted on, either before this meeting or during it. This is six days before the the Reg 18 Consultation starts, and how can two new site references be covered by the statement highlighted in bold above?

7. The main evidence documents for the Reg 18 Consultation dated 7th November 2022 to 15th January 2023 are; The Exmouth Sites - additional information.pdf, the HELAA Report, and the Sustainability Appraisal Report. ALL of these documents identify Exmo_46 as the site to be taken forward to Reg 18 consultation and NOT the Exmo_20 site. It is astounding to note that sites Exmo_20a and Exmo_20b are not mentioned within ANY of these documents, yet somehow are the sites that were taken forward to the Reg 18 Consultation.

8. The Draft Local Plan is the focus for the consultation and all supporting documentation should support this. Yet only Exmo_20b (second choice) that is associated with Exmo_20 is mentioned as the site being proposed within the Draft Local Plan for Reg 18. Also to be noted is the fact that none of the supporting documentation mentions site Exmo_20b (our Exmo_20a)!!

9. Exmo_20a is classed as 'rejected' on the Exmouth map, and you really have to dig down to get to the description on this site (no link from the Draft Local Plan). When you do, it just states that it is a 'rejected site' and has a reference to Exmo_20b. How can the public, and relevant Statutory Bodies be expected to comment on a 'rejected' site. Also how can you comment on a site of this size when there is NO acceptable description supplied? 10. Based on the above, and the main evidence supplied below. Exmo_20 and therefore Exmo_20a and Exmo_20b should NOT have been put forward as part on the Reg 18 Consultation. This means that they could also NOT be part of the allocation process carried out in September 2024. So ultimately CANNOT be put

forward for the Reg 19 Public Consultation. 11. If all of the supporting documentation for the Reg 18 Consultation, including the Site Selection Methodology has been TOTALLY ignored, then why should we believe that the Reg 19 Consultation is going to be any different?

1. INTRODUCTION

I am one of numerous residents within the Exmouth and Budleigh Salterton area who have been frustrated by the total lack of transparency shown by EDDC with regards to the handling of site reference Exmo_20 which has now been put forward for allocation as part of the Reg 19 Public Consultation.

Please find detailed below my concerns relating to the handling of site references Exmo_20, Exmo_46, Exmo_20a and Exmo_20b during the build up to, and within, the EDDC Reg 18 Consultation that ran between 7th November 2022 and the 15th January 2023, and ultimately the build up to the EDDC Reg 19 Public Consultation that started on the 13th February 2025 and due to finish on the 31st March 2025.

2. BACKGROUND

The first time that I heard of this site (Exmo_20 with between 700 to 1000 new homes proposed), was on the 4th September 2024 following the incorrect decision of the Strategic Planning Committee (SPC) meeting on the 3rd September 2024.

This decision by the SPC, was to allocate site Exmo_20a against their own planning officers recommendation (which was not to allocate), along with site reference Exmo_20b, and created site reference Exmo_20.

The point that numerous concerned residents and myself have been making to the SPC since the 4th September 2024 is that we 'the public' have not had an opportunity to discuss/object to this development. However, despite our best efforts via email and in person (numerous public speakers at meetings, including 6 representations at the last SPC Meeting on 4th February 2025 before the Reg 19 Public Consultation started), we have been ignored and told on numerous occasions that we (the public) have been

consulted with regards to these sites. I would like it noted that 'we' do not believe this to be the case.

With regards to site reference Exmo_20 and the other site reference numbers related to the 'Land at St Johns'. Please find detailed below what I understand to be the timeline running up to the EDDC Reg 18 consultation from 7th November 2022 to 15th January 2023, including all relevant document references (evidence).

This information has been found primarily within the documents, minutes, and YouTube videos associated with the Strategic Planning Committee (SPC) meetings between 14th December 2021 and 1st November 2022. The HELAA and Sustainability Appraisal Report information is taken from the documents supplied for the Reg 18 consultation as is the 'Exmouth Sites - additional information' document.

3. EVIDENCE

SPC meeting - 14th December 2021

The Draft Local Plan brought to this meeting does not mention anything to do with 'Land at St Johns' or site Exmo_20.

SPC meeting - 9th August 2022

The Developers Presentation from PCL (3 members), presented the 'Land at St Johns' site and confirmed that they were only proposing the Southern area of the original Exmo_20 for 75 homes initially with the option for another 75 later, so total of 150 homes. They were asked by Councillor Nick Hookway if they were going to develop around the Northern part of the original Exmo_20 site around St John in the Wilderness Church. To which the developers responded (at 3 hours and 56 minutes into the youtube video) that they were 'no longer promoting for development' the Northern part

of the site. Apparently there was some confusion with regards to which site they were referring to. Councillor Jessica Bailey asked what EDDC site reference number they were discussing here (at 3 hours and 51 minutes into the YouTube video) and the response from the developers was ‘I think it is Exmo_20’. This was incorrect and SPC should have been informed that it was Exmo_46, as identified in 6th September 2022, Appendix 2 - Exmouth Amended Version.pdf (see 6th September meeting information below).

SPC meeting - 6th September 2022

From the minutes of the meeting, the following recommendations were agreed.

RECOMMENDATION: That Strategic Planning Committee:

1. Recommend endorsement of the preferred sites and 2nd choice sites as suitable for consultation;
2. Note the likely shortfall in housing sites identified within this committee report’
3. That a report be brought to a future meeting of Strategic Planning Committee to set out options for the weighting of site constraints and assessments to inform future assessment work, post consultation on the draft Local Plan.

Committee Members were in support of the three recommendations.

Within the agenda for the meeting the following was found under item 28 for the site assessment work at Tier 1 and 2 Settlements. The decision was not to discuss every site so recommendation 1 above was applied.

Within the document Appendix 2 - Exmouth Amended Version.pdf, on Pages 31 to 34, Exmo_20 is identified and the important thing to note here is the following description which is copied from the document.

Should the site be allocated? Potential 2nd choice allocation, though following presentation at Committee by agents this is specifically so for Exmo_46. At this stage of plan making work (August 2022) it is not known if all of Exmo_20 is actually now being promoted by the land owner or owners for development but given the presentation to committee and the new call for site submissions we are assuming that active promotion of most of site Exmo_20 is not now occurring.

It is to be noted that the above document is the same as the 'Exmouth Sites - additional information.pdf' which is part of the evidence within the Reg 18 Commonplace site, as described later in this evidence section.

Questions/Statements

1. Only the 'preferred' and 'second choice' sites were mentioned in recommendation 1. Therefore, it was recommended that the 'preferred' and 'second choice' sites were endorsed as suitable for consultation. There is NO mention of 'rejected' sites being suitable or to be taken forward for consultation. SPC meeting - 7th October 2022

Draft Local Plan highlighted the following for 'Land at St John's' on page 72.

Exmo_20 – this land to south of St John's on the eastern side of Exmouth is proposed for proposed for 150 new homes and 0.6 hectares of employment land.

Questions/Statements

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

1. Based on the Appendix 2 - Exmouth Amended Version.pdf statement identified within the 6th September meeting notes above. Why mention Exmo_20? This should be Exmo_46 not Exmo_20.
2. Exmo_46 should have been used from this date onwards!!
3. This is the start of the confusion surrounding Exmo_20

SPC meeting - 1st November 2022

The SPC approved the following:

RESOLVED:

1. Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content;
2. That the draft Local Plan, as appended to this report and subject to final refinements, for public consultation be endorsed.

The following is the ‘copied’ description taken from the Draft Local Plan presented on the agenda for this meeting. It is taken from the Tracked Changes Version of the draft Local Plan for Consultation which highlighted the following for 'Land at St Johns' on page 80.

Land at St John's (Exmo_20) – this land to south of St John's on the eastern side of Exmouth is proposed for proposed for 150 new homes and 0.6 hectares of employment land.

Note : Exmouth, item 58.pdf shows East Devon Local Plan 2020-2040 - Exmouth- now has Exmo_20a and Exmo_20b.

Questions/Statements

1. Exmo_20a and Exmo_20b have never been mentioned before they suddenly appear on the map under Exmouth item 58.pdf. This map is titled 'East Devon Local Plan 2020-2040 - Exmouth'.
2. There was no discussion in this meeting with regards to this map, despite the fact that it included two new sites that had never existed until now. Why???
3. Again, the addition of TWO new site references six days before the start of the consultation - surely this is in conflict with the Resolved point 1 above starting 'Delegated.....'

Last information on Exmo_20 was at the SPC meeting on 6th September 2022 within the Appendix 2 - Exmouth Amended Version .pdf which highlighted that Exmo_46 was the only part of Exmo_20 being put forward for development.

Draft Local Plan used for both Reg 18 Consultations. ** Note: The first Reg 18 Consultation started on 7th November 2022, so 6 days after the last SPC Meeting identified above **

The following is the 'copied' description from page 69 of the Draft Local Plan to be used in both the Reg 18 consultations.

Land at St John's (Exmo_20 the proposal is to allocate Exmo_20b as shown on the Policies Map) – this land to south of St John's on the eastern side of Exmouth is proposed for proposed for 150 new homes and 0.6 hectares of employment land.

The Policies map in Reg 18 shows Exmo_20a and Exmo_20b. With Exmo_20a identified as 'rejected' and with Exmo_20b identified as 'Second Choice '.

Questions/Statements

1. Does the addition of Exmo_20b in the description above, fall within point 1 of the 'Resolved' section which the SPC approved at the 1st November 2022 meeting? The addition of a new site reference seems more than minor , etc...?
2. Again, why did Exmo_46 not get used here? The HELAA and Sustainability Appraisal reports do not reference Exmo_20a or Exmo_20b, nor does the 'Exmouth sites - additional information' document. ALL of these documents are put forward as evidence as part of the Reg 18 Consultation, and ALL only reference Exmo_46 as the site to be taken forward.
3. Exmo_20a is identified as 'Rejected'. I can understand consultation happening against 'preferred' and 'Second Choice' sites but not 'Rejected'. As a member of the public (if I knew the consultation was taking place that is), I would not comment against a 'rejected' site and for EDDC to claim such a thing is very disappointing.
4. Based on point 3 above, how can EDDC class Exmo_20a as having been consulted on???? Note: During the Reg 18 consultation only 2 members of the public responded to Exmo_20a and only 4 members of the public responded to Exmo_20b. This rather indicates the lack of public awareness of this consultation, and the fact that the larger part of this site was classed as 'rejected'. Especially when you consider that this site is for between 700 to 1000 new homes.

Descriptions of sites Exmo_20a and Exmo_20b put forward within the Reg 18 Consultation.

The following are the descriptions that were provided within Commonplace for the Reg 18 Consultation:

Exmo_20a - REJECTED Originally assessed alongside LP_Exmo_20b - Land at St John's (potential 'second best' allocation – 150 homes), this part of the site has been rejected for development.

Exmo_20b - POTENTIAL 'SECOND BEST' ALLOCATION - 150 homes (based on the reduced site area now being promoted based on the presentation to the Strategic Planning Committee meeting – Aug 9th 2022) and 0.6 hectares of employment land

The site as originally assessed (which also included LP_Exmo_20a) was large scale and as such could meet a lot of the overall housing needs.

It is also well screened and so long as development is predominantly in central and southerly parts of the site then building work should be comparatively unobtrusive (especially noting the overall scale of what could be accommodated).

However, there are built heritage sensitivities associated with the site and more significantly there are significant local levels of biodiversity interest at the site that could be adversely affected by development.

A site promoter shows highway access to the south of the site coming through lengths of Unconfirmed Wildlife Site, which would clearly cause destruction and landscape scale severance of what could be high value habitats (deciduous woodland).

In addition, this access road would use existing residential roads that suffer from localised congestion.

The possible highway suitability would require more detailed and fine-grained assessment should proposals progress.

The site is not identified as a preferred site, but it is suggested that it may be a possible 'second best' choice, though noting significant challenges that the site presents.

At a Strategic Planning Committee meeting, a presentation from agents acting for the/a landowner advocating a much more modest scheme of one field for 75 dwellings, though with potential to also build in an adjoining field to take the total to 150 homes.

We have adjusted second best potential capacity down to 150 dwellings to reflect the landowner's submission.

Questions/Statements

1. The description for Exmo_20a confirms that the site was classified as rejected, so why would anybody think that they needed to consult on this site?
2. Even if the site was put forward as 'preferred' or 'second choice', how would anybody make a sensible comment with regards to this site based on the site description provided?
3. The description for a site of this size (proposed for a minimum of 550 homes) cannot be seen as 'acceptable'. Yet no comments made regarding this or the fact that there is NO supporting information for this site (or Exmo_20b) and only 2 comments received from the public regarding Exmo_20a.
4. Only Exmo_20b is referred to within the Draft Local Plan which is supposed to be the driver for the consultation.
5. As previously mentioned, Exmo_20a and Exmo_20b should never have been created or put forward. Only Exmo_46 should have been put forward. This is evident from the EDDC's own evidence/documentation, meeting minutes and meeting videos. Reg 18 evidence documents to be noted in addition to the above.

HELAA Report November 2022

The HELAA report identifies Exmo_20 as 'probably unachievable', and the site is included in the list of sites within Appendix E(v) 1 Available but not suitable or achievable - Housing sites

The HELAA report identifies Exmo_46 as 'probably achievable if'.

Questions/Statements

1. There is no mention of sites Exmo_20a or Exmo_20b in the whole of the HELAA report apart from them being shown within the interactive map which you really have to dig down to, to even get to see it - do not know when this map was updated with this though.
2. Why has the HELAA report been ignored with regards to Exmo_46?

The Site Selection Methodology document (dated May 2022)

This document was effective from May 2022 until Version 2 was published in December 2024.

This document details the site selection process and the four main stages.

Stage 2 of this methodology is important here as it covers the 'site sifting' stage. Where sites must pass certain criteria to be allowed to be considered for stage 3 which effectively means that they can be considered at this point in time for Reg 18 Consultation. The following is a copy of the relevant parts of the Stage 2 Site Sifting criteria from this document.

1.8 Following the 'long list' of sites identified in Stage 1, a 'sifting' process will be carried out to ensure that only 'reasonable alternatives' are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.

Figure 2: Sifting criteria

Sifting criteria Reason a) Site is assessed as 'suitable, available and achievable' in the HELAA

Based on the fact that site Exmo_20 is identified within Appendix E(v)1 of the HELAA report as 'Available but not suitable or achievable'. The site Exmo_20 fails the 'site sifting' criteria for stage 2 as it does NOT meet criteria a).

Questions/Statements

1. Based on the 'Site Sifting' criteria and the HELAA Report information highlighted above. Exmo_20 should have failed the 'Site Sifting' stage, and therefore, NOT have been put forward for Reg 18 Consultation, and ultimately COULD NOT BE AVAILABLE FOR Reg 19 Public Consultation.
2. What is the point of having the HELAA Report and the Site Selection Methodology if EDDC just go ahead and ignore them? the Sustainability Appraisal (SA) report for Reg 18 dated November 2022 - 571 pages

Pages 251 to 268 refers to Exmouth. With regards to references to Exmo_20, Exmo_20 is only being mentioned briefly and the rest of the references are for site Exmo_46.

The following is a copied description on page 253 detailing Exmo_20 and the reason for Exmo_46 being put forward instead.

Site Exmo_20 - Land at St. John's - was originally submitted through HELAA work as a very substantial site on the eastern edge of Exmouth, it is understood, however, that the site overall is no longer being promoted for development by the landowner but the landowner is promoting a southerly part of it for development and this has come in as 2022 call for sites submission and given reference Exmo_46. Site Exmo_46 is assessed, all be it the land owner also advised that land to the west of the submission site may be available for development and the SA assessment work covers the potential of the larger (additional area incorporated to the west) as this forms a proposed allocation for development.

Questions/Statements

1. Similar to the HELAA documents above, there is no mention of sites Exmo_20a or Exmo_20b in the whole of the Sustainability Appraisal Report apart from in the map shown on page 251 - WHY??

2. Based on the fact that the HELAA and Sustainability Appraisal Report both refer to Exmo_46 as the site to go forward for this phase, WHY do Exmo_20a and Exmo_20b even come into existence????

The Exmouth Sites - additional information.pdf

A 60 page document found within the EDDC Reg 18 Commonplace site within the 'List of policy maps' section (which is the last of the 4 proposals under the heading of 'HAVE YOUR SAY ON OUR PROPOSED SITES'). This document can be found by clicking on the 'List of policy maps' icon, then clicking on the 'Exmouth' policy map. This then takes you to the Exmouth policy maps page. At the top of this page there is a 'Check out the following documents' title which provides you with an option to click on the 'Exmouth Sites - additional information.pdf'. If you click on this link you will be supplied with a 60 page document titled 'Appendix 2 Site Selection - interim findings at Tier One and Tier Two settlements'. If you go to page 31 you are presented with the site Details for settlement Exmouth for Site reference number Exmo_20. The description for this site reference number is as follows :

Site reference number: Exmo_20, but also new 2022 call for sites site Exmo_46 that falls within Exmo_20 and by default a larger 2017 submission, site GH/ED/76.

Please note there is no reference to sites Exmo_20a or Exmo_20b within this document.

Pages 31 to 34 of this document detail the site assessment summary etc. for this site. Including the 'Should this site be allocated?' section. This section states the following:

Potential 2nd choice allocation, though following presentation at Committee by agents this is specifically so for Exmo_46. At this stage of plan making work (August 2022) it is not known if all of Exmo_20 is actually now being promoted by the land owner or owners for development but given the presentation to committee and the new call for site submissions we are assuming that active promotion of most of site Exmo_20 is not now occurring.

Questions/Statements

1. Similar to the HELAA Report and the Sustainability Appraisal Report documents above, there is no mention of sites Exmo_20a or Exmo_20b in the whole of this document.
2. Based on the fact that this document along with the HELAA Report and Sustainability Appraisal Report ALL refer to Exmo_46 as the site to go forward for this phase, WHY do Exmo_20a and Exmo_20b even come into existence????

4. CONCLUSIONS

1. Exmo_20 has NEVER been consulted on as a ‘whole site’. It was not put forward as part of the Reg 18 Consultations, and Exmo_20a and Exmo_20b have only been discussed separately. Exmo_20 as a ‘whole site’ was only put forward following the decisions made at the SPC meeting on the 3rd September 2024.
2. Exmo_20 as a ‘whole site’ is a totally different consideration to the sites Exmo_20a and Exmo_20b. The fact that the description within the Draft Local Plan for Reg 19, states that ‘Vehicular access to accommodate modest levels of development, will be allowed for southern site parts from the road ‘Southern Wood’..... Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the North’ . This effectively means that the site will be split into two in anyway, how else can you only have ‘modest’ access via Southern Wood, without stopping the ‘majority’ of the site from connecting to this access point?
3. Based on the HELAA Report (which identified Exmo_20 as ‘available, but NOT achievable or sustainable), and the Site Selection Methodology document (dated May 2022 and not changed until December 2022). Site Exmo_20 should not have passed the Stage 2 ‘site sifting’ phase, and therefore, should NOT have been put forward to Stage 3 which effectively stops the site from being considered for the Reg 18 consultation. This ultimately means that Exmo_20a and Exmo_20b CANNOT be considered as part of Reg 18 Consultation, and ultimately should NOT have been in consideration for discussion at the 3rd September 2024 allocation discussion meeting. Which then means that Exmo_20 CANNOT be put forward for Reg 19 Consultation. Yet somehow these three sites have managed to get through the process. Why have (or bother) with the HELAA

Reports and the Site Selection Methodology, if you are going to COMPLETELY ignore them??

4. Even though Exmo_46 has been identified on numerous occasions since the 9th August 2022 as the only site to be taken forward of those linked to Exmo_20. It has NOT ONCE been mentioned in the various versions of the Draft Local Plan. Exmo_46 should have been used from this date onwards and would have stopped the confusion around this site that has been evident from this day forward.

5. The Appendix 2 - Exmouth Amended Version.pdf presented at the SPC meeting on the 6th September 2022, identifies Exmouth_46 as the site to be taken forward and that active promotion of most of site Exmo_20 is now not occurring. Based on this Exmo_46 should have been put forward to Reg 18 as 'Second Choice', and this should have been the ONLY site taken forward that was linked to Exmo_20.

6. The main evidence documents for the Reg 18 Consultation 7th November 2022 to 15th January 2023 are; The Exmouth Sites - additional information.pdf, the HELAA Report, and the Sustainability Appraisal Report. ALL of these documents identify Exmo_46 as the site to be taken forward to Reg 18 consultation and NOT the Exmo_20 site. It is astounding to note that sites Exmo_20a and Exmo_20b are NOT mentioned within ANY of these documents, yet somehow are the sites taken forward to the Reg 18 Consultation.

7. The HELAA Report, Site Selection Methodology, Sustainability Appraisal Report, and the 'Exmouth sites - additional information pdf' document, all support the INCLUSION of site Exmo_46, and the EXCLUSION of site Exmo_20 from the Reg 18 consultation. However, ALL of the information in ALL of these KEY documents has been ignored and there is no justification been provided for these decisions.

8. The resolution 'Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content' was agreed by SPC at the 1st November 2022 meeting. Yet somehow two new site references Exmo_20a and Exmo_20b (which is more than a minor change) are suddenly introduced without any discussion or descriptions. The only indication of these new sites is within the Exmouth map provided as part of the 1st November 2022 meetings report pack (but again no discussion around the introduction of these new sites). This is six days before the the Reg 18 Consultation starts.

9. On the 6th September 2022, the SPC agreed to 'Recommend endorsement of the preferred sites and 2nd choice sites as suitable for consultation'. There is no mention of putting 'rejected' sites forward for consultation, yet EDDC claim that because they have

received comments on 'rejected' sites then they have been consulted on. Why have comments against rejected sites been taken as 'the site has been consulted on'? Of particular note is the description (or lack of) for site Exmo_20a identified within the main evidence above. 10. Based on all of the evidence supplied above, Exmo_20 should NOT have passed 'site sifting'. Exmo_20a and Exmo_20b should NOT have been put forward for Reg 18 consultation. Therefore, Exmo_20 CANNOT be put forward for Reg 19 Public Consultation!! 11. If all of the supporting documentation for the Reg 18 Consultation, including the Site Selection Methodology has been TOTALLY ignored, then why should we believe that the Reg 19 Consultation is going to be any different?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: You will note from the overwhelming evidence above that Exmo_20 is not a legitimate site for allocation and the decisions taken by EDDC Strategic Planning Committee are clearly flawed. I will exercise my right to speak directly to the Inspector should Exmo_20 still be in its present form when the Examination commences.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Plan is not sound because of the inevitable environmental impacts of the large scale Exmo_20 site situated on the very edge of the National Landscape. There will be significant short and long term effects if this proposal is allowed to go ahead. During the construction phase there will be considerable ecological disruption, including increased pollution and disturbance to the wildlife. Thereafter Exmo_20 will have a sustained environmental impact on a continuing and unending basis, traffic will inevitably increase on already overcrowded roads, resource consumption will increase as will waste generation these will all lead to a degradation of the surrounding natural environment. No evidence has been provided that careful evaluation, avoidance and, as a last resort, mitigation has been undertaken to ensure alignment with EDDC's environmental sustainability objectives.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There is no evidence that EDDC has adequately consulted with National Landscapes with regard to Exmo_20 as required by 2.4 of the East Devon Local Plan - Key Supporting Documents 002. It is also noted that, as documented in the referenced document and recorded in the minutes of the Strategic Planning Committee (SPC) meeting of 5/9/2023 that Budleigh Salterton Town Council (BSTC) was not included in the Duty to Co-operate despite EDDC undertaking in their Statemant of Community Involvement (p16) to consult all Town and Parish Councils.... Since the meeting of 5/9/2023 Exmo_20 was determined as "unsuitable" by EDDC and as late as 2/9/2024 the site was scheduled "Not Allocated". Somehow it is now proposed and adopted by the SPC as suitable and "Allocated"! It is patently obvious that a development of this size and impact within a few hundred metres of Budleigh and less

than 2 miles from the centre of the town, located on the edge of the National Landscape should have resulted in detailed and meaningful discussions with both BSTC and the residents of the town.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I don't think you have the right to ask this question. I clearly qualify as below from the Planning Inspectorate Procedure Guide 28/8/2024:

3.10. The right to appear and be heard by the Inspector at a hearing session is limited to those persons defined in section 20 (6) of the PCPA i.e. any person who has made a representation seeking a change to the plan within the deadline set by the LPA for Regulation 19 consultation responses. (This includes anyone seeking a change to the addendum of changes to the plan, if the LPA have submitted one in accordance with the procedure described in paragraph 1.5 above.) The Inspector may invite any other person to attend a hearing session if, in the Inspector's view, their participation will assist in assessing the soundness of the plan. But the Inspector has no power to summon a person to a hearing. In addition to the above I have been trying to be listened to by EDDC for many months without any success at all, therefore wish to speak directly to the Inspector.

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The largest development within the Local Plan (Exmo_20) is located the furthest from the designated Tier 1 town to which it is allocated, resulting in it being adjacent (a few hundred metres) to Budleigh Salterton a Tier 3 town, with it's resultant facilities, which is situated within a designated National Landscape. This policy is not legally compliant as it fails to satisfy a number of the remaining key tests, including those relating to sustainability, environmental impact and the adequacy of infrastructure provision. Furthermore, this land was previously rejected by EDDC's HELAA process as "unsuitable", indicating that it does not meet the necessary criteria for development in terms of environmental considerations and suitability for housing.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Plan is not sound because no consideration has been given to the main town affected by Exmo_20 i.e. Budleigh Salterton. This development fails to adequately address local priorities and needs and must go beyond the scope outlined in the Local Plan. This development would directly contradict POLICY OL05 of the Local plan which sets out to prevent development that would "damage the individual character and identity of settlements". There is significant concern being expressed by residents regarding the adequate protection of the St John in the WILDERNESS church, land and surrounding environment. Furthermore adequate consideration has not been given to the broader area of National Landscape including the Pebblebed Heaths SSSI which requires comprehensive safeguarding. It is essential that EDDC refrains from promoting land for development that has already been rejected by it's own HELAA process which raises significant concerns regarding the suitability of this site for development. The impact of such a large development on a discrete Tier 3 town with limited, and already

pressurised, infrastructure in accomodating such a large increase in population and activity clearly has not been considered. The inclusion of Exmo_20 is clearly in conflict with POLICY PB01 of the Local Plan (Protection of internationally and nationally important wildlife sites), it is not in accordance with the mitigation strategy and therefore SD03 is insound.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is clear that Budleigh Salterton Town Council (BSTC) has not been directly consulted correctly (see the submission made by them). This is despite the fact that Budleigh Salterton is the most proximate town to the proposed main access/egress of Exmo_20 development. BSTC members have made it clear that no time were they involved despite EDDC's commitment made in it's own Staement of Community Involvement (p16). The failure of EDDC to consult with BSTC completely undermines the effectiveness and transparency of the planning process

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I don't think you have the right to ask this question. I clearly qualify as below from the Planning Inspectorate Procedure Guide 28/8/2024:

3.10. The right to appear and be heard by the Inspector at a hearing session is limited to those persons defined in section 20 (6) of the PCPA i.e. any person who has made a representation seeking a change to the plan within the deadline set by the LPA for Regulation 19 consultation responses. (This includes anyone seeking a change to the addendum of changes to the plan, if the LPA have submitted one in accordance with the procedure described in paragraph 1.5 above.) The Inspector may invite any other person to attend a hearing session if, in the Inspector's view, their participation will assist in assessing the soundness of the plan. But the Inspector has no power to summon a person to a hearing. In addition to the above I have been trying to be listened to by EDDC for many months without any success at all, therefore wish to speak directly to the Inspector.

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

These comments are to be included in Chapter 5, Development in Towns and Villages.

The plan is not sound in that the inclusion of Exmo_20 will cause significant harm to the heritage assets at this Saxon/Norman/Medieval settlement in open country. The worst impact will be on the St John in the WILDERNESS church and grounds which is Grade II * listed, Worship, marriages, burials and church community events will not be able to continue in the middle of a building site. It probably would have helped if a single member of the EDDC strategic Development Committee had bothered to visit. Contrary to POLICY HE02

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I don't think you have the right to ask this question. I clearly qualify as below from the Planning Inspectorate Procedure Guide 28/8/2024:

3.10. The right to appear and be heard by the Inspector at a hearing session is limited to those persons defined in section 20 (6) of the PCPA i.e. any person who has made a representation seeking a change to the plan within the deadline set by the LPA for Regulation 19 consultation responses. (This includes anyone seeking a change to the addendum of changes to the plan, if the LPA have submitted one in accordance with the procedure described in paragraph 1.5 above.) The Inspector may invite any other person to attend a hearing session if, in the Inspector's view, their participation will assist in assessing the soundness of the plan. But the Inspector has no power to summon a person to a hearing. In addition to the above I have been trying to be listened to by EDDC

for many months without any success at all, therefore wish to speak directly to the Inspector.

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Plan is not sound because of the inclusion of allocated site Exmo_20. This site did not pass the HELAA test and should be replaced by other sites which are available, achievable and suitable in the HELAA. Exmo_20 would inevitably cause harm to the adjacent Pebblebed Heaths which are designated SSSI/SAC/SPA & NNR due to Exmo_20 being a supporting foraging habitat. Allocating Exmo_20 is contrary to HELAA, the Site Selection methodology and Policy PB01 of the Local Plan and not in accordance with the Mitigation Hierarchy which requires the selection of avoidance over mitigation

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having tried repeatedly to get EDDC to listen to my objections to the Plan and failed, I would like to exercise my right to speak directly to the Inspector

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Plan is not sound in respect of proposed site Exmo_20. This site consists of a heavy clay subsoil and has ineffective soakaways which would significantly exacerbate the already identified downstream flood risk along Withycombe Brook through Exmouth which is already under additional pressure from the effects of climate change. This is in clear conflict with Policy AR 01B

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having tried repeatedly to get EDDC to listen to my objections to the Plan and failed I would like to exercise my right to speak directly to the Inspector

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Plan is not sound because site Exmo_20 is in conflict with Policy OL09 and Policy PB04 this is because the Habitats Regulation Assessment of 30/01/2025 states that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to ... air quality (East Devon Pebblebed Heaths SAC/SPA) such that the Plan fails the integrity test. The primary access to the site is directly adjacent to the SAC/SPA

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having tried repeatedly to get EDDC to listen to my objections to the Plan and failed, I would like to exercise my right to speak directly to the Inspector

Full name: Mr John Hamill

Proposal:

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in direct conflict with the Strategic Nature Area 368, fragmenting and isolating habitats and destroying wildlife corridors contrary to Paragraph 13.23 of the Local Plan. It would inevitably cause harm to irreplaceable habitats, veteran trees and species rich hedgerows across 210 acres contrary to Paragraph 13.9

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having tried repeatedly to get EDDC to listen to my objections to the Plan and failed I would like to exercise my right to speak directly to the Inspector

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development of Exmo_20 would have a ruinous effect on this open countryside site and the adjacent internationally designated wildlife sites eliminating the "tranquility, wildness and dark skies" which is contrary to Policy OL01

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having tried repeatedly to get EDDC to listen to my objections to the Plan and failed I would like to exercise my right to speak directly to the Inspector

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth (1.9 miles compared with 4.6 miles) making Budleigh the most convenient and accessible town to the site. The services and infrastructure of Budleigh - Doctor - Dentist - Pharmacy - School would be the obvious and preferred choice for any new residents in Exmo_20 and would be wholly overwhelmed. The current population of Budleigh is currently 5,200 people adding 700 houses in this one development could add 2,500 people which would represent an increase of 48%!! In case you are unaware the suggested entry point to Exmo_20 is less than 100 metres from the first houses in Budleigh. This proposal therefore contravenes the Settlement hierarchy and would inevitably lead to the coalescence of Budleigh Salterton and Exmouth directly contrary to Policy OL05 of the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having tried repeatedly to get EDDC to listen to my objections to the Plan and failed I would like to exercise my right to speak directly to the Inspector

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. 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.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. 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.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004

Section 33A. 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.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I have tried over many months to get EDDC to listen to the points outlined in this submission without any success at all. I would like the opportunity to present the facts to the Inspector

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

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4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: NPPF Chapter 3 Para 16 states that "Plans should be shaped by early, proportionate and effective engagement between plan makers, communities and statutory consultees. This Plan has clearly failed in this obligation. In respect of engaging with communities Exmo_20 was not proposed for Allocation throughout the period of engagement but from the moment it was manoeuvred to be Allocated there has been no opportunity for the local community to engage. Any attempt to discuss this site has been rejected in a high handed manner by the Strategic Planning Committee despite this site being, at times, the only one in the whole of East Devon where representations were being made. Furthermore Natural England as a Statutory Consultee has not been consulted on Exmo_20 despite the site adjoining a SAC/SPA/SSSI. This is a clear failure of EDDC to consult as they are required to by law..

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation Exmo_20 is in conflict with Paragraph 3.30. EDDC has been forced to extend the settlement boundary of Exmouth to include not only the land which it is intended to build on but also the 400 metre buffer zone it is necessary to provide. The nett effect of this desperate move is that there will be houses in Budleigh Salterton that are just yards from houses in Exmouth! Clearly this represents ribbon development in contradiction the the Council's own Policy. The Plan acknowledges that housing cannot be built on the buffer zone but by including it within the settlement coundary it makes it available for other types of development. As a result of this manoeuvring the Plan fails entirely to offer robust protection against the adverse effects of excessive amounts of human traffic on the Pebblebed Heath.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation Exmo_20 is in conflict with Paragraph 3.30. EDDC has been forced to extend the settlement boundary of Exmouth to include not only the land which it is intended to build on but also the 400 metre buffer zone it is necessary to provide. The nett effect of this desperate move is that there will be houses in Budleigh Salterton that are just yards from houses in Exmouth! Clearly this represents ribbon development in contradiction the the Council's own Policy. The Plan acknowledges that housing cannot be built on the buffer zone but by including it within the settlement boundary it makes it available for other types of development. As a result of this manoeuvring the Plan fails entirely to offer robust protection against the adverse effects of excessive amounts of human traffic on the Pebblebed Heath.

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2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy OL01 which states " development will only be permitted where it would not harm the aesthetic and perceptual factors such as «tranquility, wildness and dark skies». The site is distinctive for exactly these three characteristics. It is one of the few remaining areas of dark skies and tranquility here. In addition to the light from the housing development there will be significant additional light pollution due to the significantly increased vehicular activity and the impact of car headlights across the site. The area around St John's in the Wilderness church is characterised by a strong sense of remoteness and tranquility indeed a "wilderness" integral to the Grade 11* listed church and nearby listed houses - Barton House and Wilderness House. It will be impossible to retain this sense of peace and calm with a housing development surrounding it.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy OLO1 which states " development will only be permitted where it would not harm the aesthetic and perceptual factors such as «tranquility, wildness and dark skies». The site is distinctive for exactly these three characteristics. It is one of the few remaining areas of dark skies and tranquility here. In addition to the light from the housing development there will be significant additional light pollution due to the significantly increased vehicular activity and the impact of car headlights across the site. The area around St John's in the Wilderness church is characterised by a strong sense of remoteness and tranquility indeed a "wilderness" integral to the Grade 11* listed church and nearby listed houses - Barton House and Wilderness House. It will be impossible to retain this sense of peace and calm with a housing development surrounding it.

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2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Paragraph 13.9. There are a great number of mature trees on this site many of which show signs of veteranisation. it will not be possible to mitigate the impact on these trees as they are widespread and interspersed throughout the entire site. Exmo_20 also contains many long established hedgerows all across the site the lengths of which are considerable, the trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Paragraph 13.9. There are a great number of mature trees on this site many of which show signs of veteranisation. it will not be possible to mitigate the impact on these trees as they are widespread and interspersed throughout the entire site. Exmo_20 also contains many long established hedgerows all across the site the lengths of which are considerable, the trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors.

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2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Allocation of Exmo_20 is in conflict with Paragraph 13.23. Exmo-20 lies within an identified Strategic Nature Area (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The Allocation of Exmo_20 is in conflict with Paragraph 13.23. Exmo-20 lies within an identified Strategic Nature Area (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond.

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2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The allocation of Exmo_20 is in conflict with Objective 8. It will inevitably adversely affect the natural environment and result in the loss of much long-established biodiversity

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 is in conflict with Objective 8. It will inevitably adversely affect the natural environment and result in the loss of much long-established biodiversity

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy PB04. The Habitats Regulation Assessment (30/01/2025) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA).

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy PB04. The Habitats Regulation Assessment (30/01/2025) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC/SPA).

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2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Para 12.28. The Habitats Regulations Assessment of 30/01/2025 confirms that there is " currently not sufficient certainty to rule out the adverse effects in integrity in relation to air quality" (East Devon Pebblebed Heaths SAC/SPA). The only realistic access to Exmo_20 is to be the B3179 which would significantly increase the traffic flow on the boundary of the Pebblebed Heaths.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with Para 12.28. The Habitats Regulations Assessment of 30/01/2025 confirms that there is " currently not sufficient certainty to rule out the adverse effects in integrity in relation to air quality" (East Devon Pebblebed Heaths SAC/SPA). The only realistic access to Exmo_20 is to be the B3179 which would significantly increase the traffic flow on the boundary of the Pebblebed Heaths.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

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2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with policy TR03. The Local Plan highlights that congestion is a particular problem in Western East Devon and it is evident that Exmo_20 will add significantly to the congestion in and around Exmouth. The only proposed access within Exmouth is a residential cul-de-sac containing 10 houses which leads onto another residential road which in turn leads onto Dinan Way. This is not a sensible way to develop a site for 700 houses. Dinan Way suffers from continual traffic usage due to the ongoing development of many hundreds of houses. In addition to the congestion this site will cause in and around Exmouth and Budleigh Salterton, a significant number of vehicles will be forced to travel towards the M5 and Exeter through the village of Woodbury which is already a traffic pinch point.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 is in conflict with Policy AR01 (B). The site sits upstream from Exmouth on the main rainwater catchment area of Withycombe Brook, the soil is heavy clay, thus making soakaways ineffective and the land is often waterlogged. Building on this steep site will significantly exacerbate already identified flood risks through the lower-lying land around Withycombe Village road already an identified flood risk.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo_20 is in conflict with Policy AR01 (B). The site sits upstream from Exmouth on the main rainwater catchment area of Withycombe Brook, the soil is heavy clay, thus making soakaways ineffective and the land is often waterlogged. Building on this steep site will significantly exacerbate already identified flood risks through the lower-lying land around Withycombe Village road already an identified flood risk.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 is in conflict with Para 3.34, putting aside the fact that this site is in fact an extension to the town of Budleigh Salterton, the nearby Tier 1 settlement of Exmouth does not have sufficient infrastructure for the existing population let alone another 1500 - 2,000 people. The proposed development will not add another doctors' surgery, dentist, pharmacy or hospital all of which are desperately need now. The current levels of educational provision are inadequate as can be seen by the number of children who currently have to travel to Cranbrook for secondary school.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo_20 is in conflict with Para 3.34, putting aside the fact that this site is in fact an extension to the town of Budleigh Salterton, the nearby Tier 1 settlement of Exmouth does not have sufficient infrastructure for the existing population let alone another 1500 - 2,000 people. The proposed development will not add another doctors' surgery, dentist, pharmacy or hospital all of which are desperately need now. The current levels of educational provision are inadequate as can be seen by the number of children who currently have to travel to Cranbrook for secondary school.

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First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

"consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

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2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with para 3.2. It will increase the number of car journeys people need to undertake and will significantly increase the length of these journeys. The housing is proposed at the southern edge of the site whereas the only access and ingress into the site is at the very northern edge of the site where it joins the Pebblebed Heaths (SAC/SPA/SSSI). Because of the mandatory 400 metre buffer zone to the Pebblebed heath (one of only three in the whole of Europe) there will be a minimum km drive to access the site from the main road, km of driving just to get home and back! From the main road there is a further 7km drive to the centre of Exmouth. Exmo_20 would result in a large increase in car journeys and more cars travelling more miles.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

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2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy HE02 - development of the size proposed surrounding St Johns in the WILDERNESS church (grade 2* listed) will destroy the remote and tranquil setting of this medieval building. The drawings submitted at the Allocation meeting completely ignored the presence of the church and it's historic graveyard.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy HE02 - development of the size proposed surrounding St Johns in the WILDERNESS church (grade 2* listed) will destroy the remote and tranquil setting of this medieval building. The drawings submitted at the Allocation meeting completely ignored the presence of the church and it's historic graveyard.

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2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 is at direct variance with EDDC's own policy TR01 in that it is predicated on walking or cycling the 4.2 miles to the centre of Exmouth and will socially divide all those without access to cars.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo_20 is at direct variance with EDDC's own policy TR01 in that it is predicated on walking or cycling the 4.2 miles to the centre of Exmouth and will socially divide all those without access to cars.

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2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in conflict with Policy TR01, it is 4.2 miles from the centre of Exmouth without any public transport connections and no viable way of creating such connections. It is unconceivable that people will walk or cycle UP a hill with this gradient to then return the 4.2 miles to the shops schools, healthcare and facilities they need. Studies cited in the Local Plan claim that most people will walk if their destination is within 0.5 miles, beyond 1.0 miles cars are the dominant form of transport, beyond 2.0 miles journeys on foot are rare. This development with it's only access will clearly breach EDDC's own Policy TR01.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

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2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Allocation of Exmo_20 is in strict conflict with policy 11.6, it is not within 800 metres of any key services and facilities. Any facilities that are built will not reduce the need for accessing Exmouth Town centre despite the 4.2 mile car journey. Vacuous undertakings were made by potential developers suggesting they would build infrastructure but the recent development at Cranbrook shows this will not happen.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

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Full name: Mr John Hamill

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Allocation of Exmo_20, against the advice of their professional Officers, is in clear and obvious conflict with Para 2.6. Exmo_20 is not at all modest, unlikely to be sensitively planned and is in effect a "comprehensive development scheme" on the outskirts of Budleigh Salterton.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The Allocation of Exmo_20, against the advice of their professional Officers, is in clear and obvious conflict with Para 2.6. Exmo_20 is not at all modest, unlikely to be sensitively planned and is in effect a "comprehensive development scheme" on the outskirts of Budleigh

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

- Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

Full name: Mr John Hamill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Exmo_20 was allocated by Councillors against the advice of Officers despite there being no viable access for the 1500 cars that will use it. Following Allocation an informal discussion was held with Devon CC who limited access to the north eastern side of the site which is 4.2 miles from the centre of Exmouth (the Tier 1 town with which it is associated) but only 2.2 miles from Budleigh Salterton a tier 3 settlement only 2.2 miles away. Clearly Budleigh with none of the required infrastructure will be the nearest point for any new residents. The access arrangements proposed by DCC will lead the new inhabitants inevitably into Budleigh rather than travelling twice the distance to Exmouth. Despite the sprawling growth of Exmouth over recent years the two towns are currently separate in terms of provision of services but this development would merge the two with residents living in one town reliant on the other for services and infrastructure. Clearly a conflict with policy OLO5.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Exmo_20 was allocated by Councillors against the advice of Officers despite there being no viable access for the 1500 cars that will use it. Following Allocation an informal discussion was held with Devon CC who limited access to the north eastern side of the site which is 4.2 miles from the centre of Exmouth (the Tier 1 town with which it is associated) but only 2.2 miles from Budleigh Salterton a tier 3 settlement only 2.2 miles away. Clearly Budleigh with none of the required infrastructure will be the nearest point for any new residents. The access arrangements proposed by DCC will lead the new inhabitants inevitably into Budleigh rather than travelling twice the distance to Exmouth. Despite the sprawling growth of Exmouth over recent years the two towns are currently separate in terms of provision of services but this development would merge the two

with residents living in one town reliant on the other for services and infrastructure. Clearly a conflict with policy OLO5.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Having attempted over many months to be heard by EDDC I would like the opportunity to speak to the Inspector to show the total lack of "consultation" undertaken by the Council and their continual efforts to prevent any reasonable objections to their pre-conceived plan..

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 mislead 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 thsi was the only site that could possible 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 Consulation 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..

Linda Hamilton

Full name: Linda Hamilton

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Otry_20: I consider that the allocation of employment land at Otry_20 is wholly inappropriate, given that the site is located off Green Lane, a very narrow single-track lane with two humpback railway bridges, severely impeding vehicular visibility. No footpaths are present and the creation and operation of an employment site in this location would place pedestrians in extreme danger; this is a lane used by numerous families to walk their children between home and the village primary school, and for secondary school children to walk to and from their bus stop to Kings School on Ottery Road. It is also used by many dog walkers in Feniton, who walk along Green Lane as part of a loop around the village. Green Lane is of significant amenity value to villagers. In addition to this, the narrow blind bend on Ottery Road between the A30 and the turn into Green Lane in Feniton is extremely dangerous; the addition of numerous large industrial vehicles using this road would lead to very dangerous conditions for pedestrians and cyclists (who often move between Feniton and Escot estate) and would make conditions for all road users extremely difficult. There are already numerous near-misses at the junction of Green Lane due to poor visibility and backed-up vehicles. The road between the A30 and Green Lane is regularly flooded after rainfall (and this will be exacerbated once the flood defence scheme is operational as more water will flow over Ottery Rd). When this occurs, large vehicles would be forced to travel through Fenny Bridges, along single track Green Lane and over the railway Bridges, or to access the site via Payhembury from the north and over the level crossing in Feniton, both of which would be wholly unacceptable. There is no reason for employment land to be allocated

in this location – Feniton is not close to commercial centres where large articulated vehicles would need to move to and from. It would simply be bringing large vehicles into an inappropriate area to destroy the amenity value of that area for residents. The recent flood scheme in the village has resulted in increased vehicular movements on Green Lane (due to location of site compound), with multiple construction vehicles and deliveries and movement of aggregate and concrete. The result of this has been chaos on the lane, with traffic stopped and reversing, children, pedestrians and cyclists being put in danger. This simply cannot be allowed to be the permanent situation. Pg 37 of the draft Local Plan states: E(g)(i) Office use - to be primarily located in the town centres of tier 1 and 2 settlements and the proposed new community. Office use will be permitted on site allocations as an ancillary part of other business uses. E(g)(ii) Research and Development and (iii) industrial use (which can be carried out in any residential area without causing detriment to the amenity of the area)- will be met through employment site allocations, alongside larger housing developments as allocations and as windfall development. I have no doubt whatsoever that the allocation of employment land at Otry_20 would be of significant detriment to the amenity of the area and thus this allocation is contrary to the Strategic Policy SP04: Employment provision and distribution strategy The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton. It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton. Similarly, any vehicular access to the proposed housing allocation Feni_08 from Green Lane, would be totally inappropriate, for the reasons given above with respect to this single-track lane. Green Lane is simply not of sufficient size for additional traffic volumes, and given the railway bridges present on it, cannot be widened to be appropriately sized. Furthermore, Broad Rd at the other side of Feni_08 is a single track road which leads past the primary school. The quantum of housing proposed for this site needs to be reconsidered in light of these constraints. References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20 Flooding:

- It's well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village,

leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.

- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency. References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy AR01 – C Disproportionate allocation of houses compared to local need:
- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village. References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E. Sewage:
- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage. References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy AR01 – C Lack of Sustainability: At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive.

- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.
- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035. References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Colin Hamilton

Full name: Colin Hamilton

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:
No protocol or direct consultation with affected residents.

2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: True science not a Plymouth University student module...

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: True science not a Plymouth University module...

3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Respect the science provided by CRAG and not be wilfully neglectful.

4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No direct consultation with each individual resident concerned and a rather sneaky underhand process only discovered by due diligence.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Individual right to private enjoyment and improvement of existing private property is not addressed. Cliff Road EX10 8JN is not a new development but established for over 1 hundred years. Willful neglect over many years by EDDC and intended willfull neglect by both EDDC and other agencies involved in this process.

Anne Hand

Full name: Anne Hand

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Not enough consideration has been given to (a) infrastructure needed to support this development (b) the dangers of having large amounts of traffic joining the already dangerous B3179 (c) the impact on users of the surrounding common land, walkers, horse riders etc (d) the real danger to the rural character of East Devon whereby the suburbs of Exmouth gobble up small towns and villages in hideous urban sprawl.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Don't build here!

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This development plan is being rushed through and not advertised to those who have legitimate concerns both from safety and aesthetic perspectives.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

John Richard Vincent Harding and Pamela Ann Harding

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The major development site proposed has been identified by EDDC Committees on which Budleigh Salterton has no representation. This has resulted in a lack of awareness in Budleigh of the potential impacts on the town which EDDC should have made the Parish Council aware as part of its duty according to Local Plan procedures. Moreover, the main site EXMO_20, which was originally rejected under HELAA, appears to have been resurrected following lobbying by Councillors who might be open to a potential breach of the Nolan Principles, as might the Officers. The proposal that the main access to the site should be directly onto the B3180 would inevitably funnel more traffic into Budleigh, Just under 2 miles away, rather than Exmouth, approx 4miles away. Budleigh simply does not have sufficient capacity in its local services (e.g. No secondary school and a limited primary school). The B3180 is in essence a minor country road, devoid of footpath, with very dangerous bends at Inner Ting Tong and bordering the highly sensitive Pebble Bed Heath. Cycle at your peril, if you can manage the gradients. The proposal would result in a community the size of Woodbury which is the antithesis of what the Foreward describes :- "...From the rugged beauty of our Jurassic Coast to the peace and tranquility of our National Landscapes, we are surrounded by a glorious, thriving natural environment; between the quiet vitality of our towns and the gentle warmth of our historic villages, we share a proud and welcoming community..." This proposal is little short of environmental vandalism. The proposed new town East of Exeter should provide the bulk of development, supplemented by more modest and limited expansion of sites that simply feed masses of additional traffic onto already inadequate roads such as the B3180 and the South exit from EXMO_20.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Abandon EXMO_20 and land to the South the Fire Station and MacDonalds

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This site was excluded from Devon County Council's original listing of available and suitable sites in Exmouth so its inclusion and the lack of notification to the neighbouring Budleigh Salterton Town Council constitute breaches of EDDC's statutory obligations. Additionally, the proposal breaches a raft of existing policies such as HE02, OL01, OL09, PB04 etc.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: This policy sets out the procedure to be adopted for plan making as set out in PCPA2004 Section 33A. Failure to follow this meant that the site was not listed by Devon County Council as a preferred or Second choice as it was considered unsuitable and unachievable. The result has been a stifling of local democratic participation

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: At the stage in the planning process when potential sites were being identified (HELAA stage20, EXMO20 was considered as being unsuitable and unachievable. For this reason it was not included in Devon County Council's Regulation 18 consultations as either a preferred or second choice site. Thus it would appear to have "flown under the Radar" , only belatedly coming to the attention of Budleigh Town Council and local residents

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Refuse EXMO20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The site is 4 miles away from Exmouth, the main centre it purports to serve . Since the topography of Exmouth is more akin to a peninsula wedged between estuary and sea proposed development is shunted onto more rural and inappropriate locations with inferior transport links and inadequate local services which are not within reasonable walking or safe cycling distance. Residents without cars would face social exclusion.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Refuse EXMO20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy OL01 is designed to prevent any harm to locations perceived to have aesthetic and perceptual factors associated with tranquility in a truly wild setting. "Dark skies" are also specifically mentioned. All of this would be sacrificed, particularly at night, due to the massive increase in housing and associated vehicle movements, especially at night with headlights lighting up the adjacent Pebblebed Heath margins.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Refuse EXMO20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The Local Nature Recovery Strategy locates the site within Area SNA368 which has a key role in combining wildlife sites, extending them and thus producing connecting wildlife sites. Development within them would destroy or at best disrupt feeding and foraging sites, completely at odds with the SPA's conservation objectives.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Refuse EXMO20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: This policy rightly seeks to protect the natural environment and increase the biodiversity of site such as the Pebblebed Heath. Exmo20 will instead undermine it.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Refuse EXMO 20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: As the site sits along the B3179 all traffic exiting from it will pass along the boundary of the protected Pebblebed Heath (SAC/SPA) thus adversely impacting on air quality.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Refuse EXMO20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Policy PB01 states that proposed development that might have an adverse impact on designated sites will not be permitted. due to its proximity to our Pebbled Heaths which have SAC and SPA rating EXMO 20 should be refused.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Refuse EXMO 20 entirely

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: John Richard Vincent Harding and Pamela Ann Harding

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: EXMO 20 falls foul of Policy OLO5 as it is located much nearer to the middle of Budleigh Salterton than it is to the middle of Exmouth so that the principal road from it will direct traffic into the narrow confines of Budleigh's High Street. This will increase the coalescence between the two towns which is already apparent along the Exmouth Road and its Southern margins. Budleigh's essential services will not be capable of coping with the increased population's reliance on everyday services such as schooling, medical care and the leisure outlet of Budleigh's beach. Exmouth 20's main infrastructure will, on the other hand, be linked into that of Exmouth's, partly through topography. This will overload some systems such as sewage and power which will themselves require significant upgrades.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmouth 20 should be excluded from the Local Plan.

Andrew Hardy

Full name: Andrew Hardy

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live at no. 8 Slewton Crescent and strongly object to the proposed development at Whimple_11 for all the reasons cited in the parish council's response, including drainage/flooding issues, unsuitable road access leading to increased traffic through the village and the need to preserve natural habitat.

Patrick Harland

Full name: Patrick Harland

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Exmo_20 would destroy the 'Tranquility, wildness and dark skies' of the countryside, which is contrary to policy OL01

The main access point of exmo-20 is significantly closer to Budleigh Salterton than Exmouth making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (doctors, school etc) would be the obvious choice for residents of exmo_20. This would lead to coalescence of Budleigh and Exmouth, is contrary to policy OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jennifer Harper

Full name: Jennifer Harper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: "I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which "could be developed" which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be "squaring off the built edge". This "built edge" dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression."

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: "To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid

rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one."

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity).

Sarah Harper

Full name: Sarah Harper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: I suggest this plan is not legal because using an online portal discriminates against the elderly who tend not to be computer savvy. This does not provide the right level of community involvement in an area where 37% of the population are aged over 60. Many of these residents would not have downloaded the East Devon App meaning their awareness of any local plan was already extremely unlikely and, if made aware, their options to respond are far too complicated and difficult to navigate. When looking at the plan on your website - although you show numerous comments of reply - there is no easy way to see which parts of the plan these replies relate to which also means you are not communicating the facts sufficiently enough to meet due diligence. I also believe the Sidmouth_31 part of the plan is not legal because you detail this development as one which “could be developed” which is a highly ambiguous statement lacking vital detail. You have not explained why previous rejections for this plot being developed have suddenly been overturned when nothing has changed, simply stating that you could be “squaring off the built edge”. This “built edge” dates back to housing built in the 1960s when regulations were different and the issues you should be considering are current environmental problems of building on today's National Landscape. The same issues that have resulted in you blocking many other developments within the National Landscape apply to this site and you have given no sound argument as to why they are being ignored. You also mention access concerns without offering any explanation of how these could be satisfactorily resolved - making this part of your plan very weak, lacking detail and not fit for progression.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All residents should receive details of this plan by mail along with the option to respond by letter to ensure all opinions get voiced. The field on Burscombe Lane (Sidmouth-31) should be removed from the plan and and other sites (of which there are many) which fall outside of the National Landscape should be considered instead.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: To develop Sidmouth-31 (Land east of Burscombe Lane / west of Windsor Mead) you are choosing to ignore other much more suitable areas to build which have easier access and more cost effective development potential, that are outside of our precious National Landscape where building should only ever be considered as a last resort. Here are the main reasons why this site should continue to be rejected for development

Access - Access via Burscombe Lane has been refused for previous developments as this lane is very narrow allowing only single car access. The road is prone to subsidence and extremely dangerous to exit onto Sidford High Street with several blind spots also causing issues when turning into Burscombe Lane. Farm vehicles, tractors and trailers frequently cause disruption in Burscombe Lane which usually means that cars have to mount the pavement to pass in the narrow parts of this road. Obviously this is not ideal and dangerous practise. You mention Windsor Mead as an alternative entry route but this is also a very narrow road with the same problems of its junction onto Sidford High Street being very dangerous to navigate. Currently any entry route from Windsor Mead would have to be positioned on land which is private property as the existing houses completely block the perimeter of the field. If requiring compulsory purchase to access this land substantial cost gets added to the project along with considerable disruption to a small cul-de-sac.

Wildlife - Within this field there are bats, owls, dormice and many species of birds. The field is recognised as being part of the hunting zone for bats from Beer Quarry Caves and these should be protected. RSPB voice concerns about the reducing numbers of many bird species and removing this vibrant piece of countryside will make this situation even worse. Badgers are also a protected species and there are many families of badgers in this area. The area is ringed by Devon Hedges which also carry environmental protection orders.

Transport - Other potential sites in Sidmouth fall within easy access to public transport. Sidmouth_31 is a long walk to a bus stop where buses run twice a day meaning all house occupants would need cars adding to the pollution and traffic concerns mentioned.

Infrastructure - Schooling, and public health services are all over stretched and if new houses get built there must be a commitment agreed and in place to ensure additional services can be provided. Our local sewerage plant is extremely dated and unlikely to be able to cope with additional properties. We already see the pollution caused by sewerage spills on our coastline and, until steps have been taken to prevent this - extra building should not be allowed.

Drainage - there is a vast amount of water sent down the hill from Core Hill Woods - so much so that Burscombe lane becomes a river in heavy rainfall. The field of Sidmouth_31 is like a bog in the winter months acting as vital drainage for this water and - if built on - would potentially cause flooding wherever the water gets diverted to or on land beyond the development. NB A video can be supplied of water running down Burscombe lane to demonstrate this point.

Noise Pollution. You mention that the view might not be affected by this build (which I disagree with) but it is also important to consider noise pollution. Currently - all you can hear when standing in this field is birdsong. New housing comes with the required new technology of things like Heat Pumps which emit quite loud humming noises (like air conditioning units). This is another reason to avoid building on National Landscapes.

View - the existing houses at Windsor Mead and Corefields are over 50 years old and have well established screening of trees and hedgerows making them barely visible from higher up. They are also at the lowest point of the valley. New houses would be very noticeable and have a significant impact on a view much admired by people walking to East Hill Strips and Core Hill Woods.

Cost Effectiveness - The strongest message regarding new housing is the need for it to be affordable - but this plot offers the least cost effective solution. Any building on National Landscapes comes with substantial restrictions and these required planning restrictions of single storey dwellings, suitable choice of building materials, and rigid

rules about positioning of reflective surfaces etc add substantial cost to any building project at Sidmouth_31. This is another reason why other sites should be prioritised instead of this one.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is impossible to answer yes because I do not know who else you are cooperating with. I know that Highways have not even been consulted yet - who I firmly believe will reject the proposal. What other departments will be consulted and will they include environmental groups such as National Landscapes and CPRE (The Countryside Charity)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Ian Harrington.

Full name: Ian Harrington.

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: No development in Axminster should encroach on the wellbeing of the River Axe and it's fragile eco-system. Or any development that will further increase the already serious flooding risk to the properties and road at Weycroft. The council, in their ignorance have passed this development despite many objections and several other preferred site in Axminster being overlooked, sites that don't encroach on the River Axe's eco-system or flood risk to properties. The development in question is Ref No:(GH/ED/83) land West of Chard Road.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Build the proposed development on one of the other preferred sites in Axminster as listed in the plan. One that is nowhere near the River Axe

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As previously stated, the development is far too close to the River Axe which will lead to pollution and more flooding at Weycroft. Also destroying the many large hedge rows will kill untold numbers of wildlife including many species of birds, lizards, adders, bats in the WW2 pill box, otters in the River Axe at Weycroft and breeding cormorants. The area

at Weycroft with it's grade one and two buildings with the backdrop of fields and the River Axe views will be blighted for ever.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: As stated previously, permission for this development should never have been given by the ill informed planning committee and why another preferred site wasn't considered beggars belief.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As previously stated, I am (as are many) upset and baffled as to why one of the other preferred sites listed in the plan that didn't encroach on the River Axe or Weycroft with it's flooding and the destruction of wildlife, wasn't considered. Some investigations by an independent body should be in order before building commences.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To make sure that the River Axe and Axminster's wildlife has a voice.

Paula Harris

Full name: Paula Harris

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with paragraph 11.2. The isolated location is unsustainable development as people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan.

Matthew Harris

Full name: Matthew Harris

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: N/A

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: N/A

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: N/A

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: I don't believe it is sound to develop here.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

From a personal viewpoint of a Whimple resident living nearby to the site at Bramley Gardens in particular, I'm not wholly against development but considering the current infrastructure here it would be completely irresponsible. I believe the main issue to be access, the existing roads cannot handle/are not sufficient for current traffic volumes as it is. It is a very narrow, single track lane with no pavements or safe way of pedestrian access. I live close by and walk my 2 year old to the school, it is frankly quite scary and

dangerous to life as it is. Adding more volume to this already inappropriate infrastructure would be grossly irresponsible and I can only conclude would be decided by individuals who have never attended the site. If pedestrian and vehicle access were MUCH improved through the center (down church road), only then perhaps it could be considered.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: These proposed developments in policy SD29 (especially Bramley Gardens), can only possibly be considered sound if the existing access and in particular the pedestrian access is vastly improved on the main road (lane) through the village.

It always shocks me how anyone can possibly expect to build and build and build without ever improving existing infrastructure/access that's ancient. It doesn't take much brain power at all to realize that eventually that will pop and the road will be permanently clogged up with pedestrians forced to jump into hedges. Please please do not build here without improving this lane first, all you need to do is walk down this lane at rush hour yourself to actually realize this. Thank you.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: As mentioned in 3(c), it totally fails anyone living here to build more houses when there is absolutely zero safe pedestrian access.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: N/A

Sue Harrison

Full name: Sue Harrison

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The principal access point to Exmo_20 is much closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient and accessible town. The services and infrastructure of Budleigh including shops, parking, doctors, school, beach, library etc would become first choice for the new Exmo_20 residents. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to Policy OL05 of the Local Plan.

An alternative site to Exmo_20 for housing allocation should be selected; one which was deemed available, achievable and suitable in the HELAA.

Exmo_20 would cause harm to the heritage assets at this Saxon/Norman/Medieval settlement contrary to POLICY HE02.

EXMO_20 would increase the need for car travel, contrary to Figure 7 - the energy hierarchy, and increase traffic congestion in conflict with paragraph 11.6. the isolated location provides unsustainable development as residents would need to travel much further than 800m to existing key services and facilities contrary to Paragraph 11.6. It is too far from any town centre to walk or cycle. This is contrary to Policy TR01.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Nichola Harry

Full name: Nichola Harry

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 should be located at an alternative site where it would cause less, or no harm to the Pebblebed Heaths (SAC?SPA). Development of Exmo_20 is contrary to Policy PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy wild-life of the countryside and have a negative effect on the dark skies, which are so important for certain creatures, this being contrary to Policy OL01.

Developing Exmo_20 would isolate habitats and destroy wildlife corridors, contrary to Paragraph 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, established and veteran trees and species rich hedgerows across the site, contrary to Paragraph 13.9.

The Habitats Regulations assessment (30.01.2023) confirms that "there is currently not sufficient certainty to rule out adverse effects in integrity in relation to air quality (East Devon Pebblebed Heaths SAC?SPA). Exmo_20 is in conflict with Policy OL09 and Policy PB04.

Exmo_20 would certainly have adverse effects on St John's in the Wilderness Grade II listed church and churchyard, drastically altering the current peaceful setting for worship. This is contrary to Policy HE02.

Exmo-20 would undoubtedly exacerbate the risk of flooding to through lower lying land at the bottom of the site and through Withycombe. It is upstream of Exmouth on the main rainwater catchment area of Withycombe. It would be on a subsoil of clay making soakaways ineffective. In conflict with Policy AR01B.

Exmo_20 would significantly increase traffic congestion in conflict with Paragraph 11.2. People would need to travel to existing services and facilities, contrary to Paragraph 11.6. It is too far for most people to walk, leaving travel by car as the only choice of transport. This is contrary to Policy TR01.

Budleigh Salterton is the nearest accessible town but the services and infrastructure would struggle. Exmouth and Budleigh Salterton would then coalesce, contrary to Policy OL05 of the Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not access site via the B3179

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Karen Harter

Full name: Karen Harter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

I am living with the appalling development know as Goodmores, it's a disgrace that all these developments are going ahead when the infrastructure isn't in place. Roads are appalling, the access to Exmouth will not be resolved with 2 new roundabouts, the

pollution and damage to our green spaces and no investment in the actual town centre which is starting to represent a depressing, grey empty area.

Karime Hassan MBE

Full name: Karime Hassan MBE

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11.1

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: [Representation on behalf of Exeter Rugby Group based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation]

Transport infrastructure and impact on the highway network: The capacity of junction 30 of the M5 to support the planned developments in the emerging policies in this Regulation 19 consultation is a key consideration for the Club. While supporting Strategic Policy TR01: prioritising walking, wheeling, cycling and public transport, the implications of all the planned developments - even allowing for the mitigation of: Local Cycling and Walking Infrastructure Plans, recently constructed and proposed rail stations, Bus Service Improvement Plan, and Park and change, still present a significant concern. WSPs Greater Exeter Mitigation Modelling listed in the technical evidence concludes: “On the eastern side of Exeter around J29 and J30, a number of junctions remain over 100% capacity in the 2040 Core with mitigation scenario. These include movements on J29 and J30 themselves, as well as at Clyst St Mary roundabout and the A30 airport roundabout. While the strategic forecast modelling provides an indication of which junctions may have capacity issues, operational modelling would be required to confirm how well the junctions perform with forecast traffic flows. National Highways have an existing VISSIM model that covers J29, J30, the A30 Airport junction and the Clyst St Mary roundabout – discussions are currently underway regarding the use of this model to test these junctions in the 2040 Core and 2040 Core with mitigation scenarios. This will take flow changes from this strategic model and be able to provide a better indication of the impacts the additional traffic from the emerging Local Plans will have on the network.” Simply stated, the technical evidence base, presently, does not give sufficient comfort that all the planned developments can be accommodated on the highway network without significant interventions that are presently unknown, this may not be unusual for the scale of the projects proposed. However, the acceptability of the developments on the highway network and the impact on businesses and communities as a consequence of congestion and delays requires further modelling and

assessment, and appropriately raises the question of the funding and delivery mechanisms required, as well as the complex range of mitigation programmes and measures that will need to accompany the required interventions in the network. It further underlines why the infrastructure plan, delivery vehicle and potential governance structure and co-ordination with both district councils and County Council is essential for the successful delivery of the strategic policies, and this goes to the heart of the test of effectiveness and soundness of the plan. This appears to be recognised in the policies and text supporting the policies, and this is welcomed. In the context of uncertainty over local government reorganisation the soundness of the strategic policies may in part be dependent on future governance and structures that fulfil a purpose of delivering early infrastructure funding to address viability and practical delivery challenges – these may go beyond any single developer's ability to deliver. For clarity, this representation is not an objection to the soundness of the Plan, it simply reinforces the need to support the approach of a comprehensive and co-ordinated approach to the spatial plan and delivery of the strategic policies. The club does not want to be in a position where the motorway junctions and local road networks are gridlocked as a consequence of incremental developments over the plan period, with the transport authority having insufficient funding to deliver the transport strategy. Presently the wording in the Emerging plan and intent appears designed to achieve the same aim and is therefore supported. The Club has had a productive relationship with the local transport authority in managing the Club's match day access strategy to ensure that the club works in a co-ordinated manner with a range of key stakeholders to ensure a positive journey experience for visitors to high profile events and minimising impacts on residents/businesses who may be affected. The Club has worked with Devon County Council to support active travel and effective co-ordination between the public sector transport providers. The venue has hosted Rugby World Cup games and has demonstrated successfully that by using park and ride shuttle services from sites within the West End in East Devon the stadium can accommodate capacity crowds and a positive experience. It is vital to the club and to the significant public interest of our local community that the transport implications of the planned growth, particularly within the West End are fully modelled, assessed and any requirements arising pulled through into a delivery plan and funding mechanism.

Full name: Karime Hassan MBE

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.1

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: [Representation on behalf of Exeter Rugby Group based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation] The representation is in general supportive of the vision and spatial strategy, and the recognition that cross boundary cooperation between East Devon and Exeter City Council is essential to discharge the duty to cooperate and to ensure the proper planning of the area, providing the essential infrastructure in a timely fashion to support the aims and objectives of the Emerging Local Plan over the Plan period. This is especially important and critical to the soundness of the Plan given the immediate uncertainty for local government faced with local government reorganisation, the creation of new unitary councils for Devon, possible devolution and elected mayors, and the immediate past record on political cooperation for strategic planning in the wider Exeter area.

Full name: Karime Hassan MBE

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.4

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: [Representation on behalf of Exeter Rugby Group based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation] The Vision statement text acknowledges the second new community will be a council and corporate led development. Therefore, given the uncertainties that presently exist for local government and the likely demands on the viability of key projects, Strategic Policy SP07: Delivery of Infrastructure; and Strategic Policy SP08: Phased Delivery of Infrastructure and Services are essential, and supported, and to be read along with Strategic Policy WS01: Development of a second new community east of Exeter.

Full name: Karime Hassan MBE

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

3.1

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: [Representation on behalf of Exeter Rugby Group (ERG) based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation]

Whilst not objecting to the spatial strategy and specific policies of interest in relation to development in the West End, the plan itself references that “comments on all concerns identified should be made at this stage of consultation, this includes in respect of policy WS01, notwithstanding that any such comments, specifically on new community matters, can be elaborated on at the second stage of consultation when more policy detail and supporting evidence will be available. These comments are therefore being made at this stage to identify those matters of concern and to lend support to the importance of some aspects that are essential to delivery of the strategic policy in relation to the West End policy proposals and to achieve the stated aims of the emerging plan. ERG wishes to be engaged in the second stage of consultation when further matters can be elaborated upon.

The Spatial Strategy and Infrastructure: The current adopted Local Plan spatial strategy of bringing homes close to employment in the West End with the provision of a new community functioning as urban extension of Exeter and with a high level of self-containment has been successful in delivering housing and employment, and supporting a more economically active population and a young population. The delivery of the key strategic allocations in the adopted local plan were supported by the work of the then South West Regional Development Agency and its ability to create a front funding mechanism and to invest in early infrastructure to enable the viability of the housing developments to proceed, and to ensure the timely provision of essential transport infrastructure that overcame concerns regarding the capacity of the M5 junction 29 and the A30 to support the planned developments. The following comments

are made recognising that presently there is no equivalent of the SWRDA supporting local authorities in Devon and the scale of investment required to realise the vision of the Emerging Plan may challenge the viability of the new community.

Summary [see upload of full representation]: ERG recognises the strategic intent of the emerging plan to support the growth of the district by directing major housing and employment to the West End, close to the city of Exeter and the major transport infrastructure. This area is vital to the economy of the sub-region and the future prosperity of the county of Devon, providing a younger demographic that is more economically active. The Club's concern is primarily focused on the transport impacts of the developments in the West End and the implications for Junction 30 and long-term consequences for Sandy Park hosting events and fulfilling its ambition. The policies and text recognise the need to provide additional master planning, infrastructure delivery plans and continued cooperation between Exeter and East Devon to meet the aims of the policies. It further recognises the requirement for a delivery mechanism, governance and stewardship to realise the vision for the new community and to address the considerable practical challenges of delivering infrastructure in a timely fashion and fulfilling the ambitions for the new community. ERG would wish to underline the importance of these matters to fulfilling the test of soundness and effectiveness of the plan. These comments are therefore being made at this stage to lend support to the importance of some aspects that are essential to delivery of the strategic policy in relation to the West End policy proposals and to achieve the stated aims of the emerging plan; and to identify the matter of concern, namely transport implications.

Full name: Karime Hassan MBE

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: This representation is in support of the vision and spatial strategy set out in the Regulation 19 consultation document, and makes specific representation on an issue of concern that should be addressed in the text content for Strategic Policy WS01: Development of a second new community east of Exeter, the appropriate section falling under the sub-heading of Social, Community and Educational facilities, and/or to be identified as an issue to be addressed in the future “allocation-wide masterplan”. Vision and Spatial Strategy The origin of the strategic policy approach to prioritising growth in the west end of East Devon arises from the Regional Strategy for the South West 1998 that directed future growth in Devon to the east of Exeter, recognising the need to support future employment and housing growth at the principal urban area. This was then incorporated into the Devon Structure Plan and this has successfully supported the growth of the Exeter area. Cranbrook, as one of two new communities in Devon (Sherford being the other) is a consequence of that policy direction. Bringing homes close to jobs with accessibility to good transport networks was seen as the most sustainable way of addressing the needs of growing the economy and supplying homes. Cranbrook functions as an urban extension of Exeter and it has been a significant contributing factor to the growth of the local economy providing family homes in good supply for the many businesses that have located in the wider Exeter area. The young demographic character of the local population is at odds with the rest of the county. The rest of the district, as the evidence shows, is getting older. The economy requires a plentiful supply of housing to meet the needs of the economy and the Vision and Spatial Strategy is a corollary of the current development plan’s approach to how best to achieve that aim in the most sustainable form. The structural challenges of the local economy of Devon are best met by continuing to focus investment to support the strategic employment and housing strategy set out in the Emerging Local Plan. Investment in sites such as the Exeter Science Park, Skypark, and the Airport require continued support to sweat those assets to the benefit of the economy. Capitalising on the graduates attracted to the university of Exeter requires both employment

opportunities as well as somewhere to live. Young and economically active population also require things to do, things to see and to support the needs of people of all ages. Much of the cultural and sporting infrastructure is concentrated in or close to the city. The spatial strategy broadly recognises this in supporting the provision of a greater proportion of new homes in the West End of the District. There are clear landscape and environmental considerations to be addressed as part of the specific site selection and options, but the spatial strategy that underpins the strategic policies set out in the Regulation 19 consultation reflect what has been a long-term policy direction set by regional, strategic and district policy makers in the past.

Full name: Karime Hassan MBE

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP07

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: [Representation on behalf of Exeter Rugby Group based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation]

Strategic Policy SP07: Delivery of Infrastructure; and Strategic Policy SP08: Phased Delivery of Infrastructure and Services are essential, and supported, and to be read along with Strategic Policy WS01: Development of a second new community east of Exeter.

Full name: Karime Hassan MBE

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP08

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: [Representation on behalf of Exeter Rugby Group based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation]

Strategic Policy SP07: Delivery of Infrastructure; and Strategic Policy SP08: Phased Delivery of Infrastructure and Services are essential, and supported, and to be read along with Strategic Policy WS01: Development of a second new community east of Exeter.

Full name: Karime Hassan MBE

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:

[Representation on behalf of Exeter Rugby Group based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation] Policy WS01 states the Council will produce an infrastructure delivery plan that will set out requirements. The text explains the emerging thinking regarding the approach to the allocation wide delivery strategy, and the possibility of a stewardship strategy and governance structure for delivery. These are all relevant and vital issues that inform the credibility of a delivery strategy and to ensure the aims of the strategic policy can be delivered and the outcomes realised. The thoughtful approach that is being taken to the policy framework, set out in the Emerging Plan, reflects learning from the first new community at Cranbrook. This approach is supported and requires further more detailed examination to ensure that the appropriate policy support is maintained and does not get diluted in order to address other planning objectives.

The Policy aims to provide a full range of social, cultural, sport, leisure, health, community and education facilities to support the provision of housing and employment, along with open spaces and facilities, and at least 254 hectares of land for green [and blue] infrastructure provision (including approximately 150Ha of Suitable Alternative Natural Greenspace (SANG) to meet Habitat Regulations requirements. The land budget requirements to meet the expectations of the new community, providing a sustainable community with a good degree of self-containment and delivering wellbeing, active lifestyles, active travel and other objectives will be challenging. Viability of housing development may be challenged if the investment in early infrastructure is required ahead of the housing sales and in the absence of a delivery mechanism, experience across the country shows that commercial town centre type uses and a range of social and community infrastructure can lag behind house building. This has an adverse impact on developing social networks and a sense of self-containment. Learning lessons from Cranbrook has informed the Council's emerging policy approach, it seeks the prioritisation of educational infrastructure and that is

supported as an approach. The area to the south of the southern boundary of the proposed second new community has an existing leisure asset base that would provide early opportunities to build social networks and connections with existing green infrastructure and organised sporting and leisure facilities. This is an opportunity that could be encouraged and incorporated into the master planning considerations that will follow. Exeter Athletic Rugby Club is located at Oil Mill Land near the A3052, ERG own the freehold of the Oil Mill playing facilities, nearby is the Exeter City Football Club facilities at the Cat and Fiddle and other leisure facilities are within easy access to the new community. There is an opportunity to provide a strategic provision for formal playing facilities using and expanding on the existing asset base that can give an accelerated provision of facilities for the new and developing new community. ERG would be keen to explore the opportunities to develop the approach to the master planning that addresses the strategic ambition and the shared objectives in developing the wellbeing, sporting and leisure offer of the new community. ERG has invested heavily in supporting the development of women's rugby and developing community programmes and more formal pathways through the academy system with Exeter College and the University of Exeter. Providing a strong sporting and leisure offer in close proximity to the large-scale housing provision could strengthen self-containment and identity for the new community and also support cross boundary joint working to address transport, wellbeing and strategic green infrastructure objectives. ERG would wish to be engaged with the Council exploring such opportunities ahead of the Council formalising master plans.

Full name: Karime Hassan MBE

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Social and community infrastructure under Strategic Policy WS01 I wish to raise a very focused observation on one aspect of social and community infrastructure that arises as a consequence of the changes that are taking place as the Exeter and Devon economy changes and the social needs of the area change. There has been a long- term challenge of supplying enough labour to meet the needs of local employers. This can be evidenced by vacancy rates/ historical data on the number of jobs advertised, and the observations from local chambers of commerce. Shortage of Labour and skills are consistently cited as constraints, this can be very challenging for specific sectors such as the care sector and construction. As a consequence of labour demand the character of the population is changing and a more diverse population is growing up. The social and community infrastructure required to support the second new community ought to reflect the needs of this changing population which will be more diverse, younger and more economically active than the rest of the district. The technical evidence and background reports on the role and function of settlements has done a good job in analysing the needs of communities and what is presently available. However, I would wish to bring to your attention a very specific need that is not presently recognised, namely, the needs of the growing Muslim population particularly in providing for future burial needs. Based on the 2021 census the actual number of people who identify as Muslim in Devon is low, the number for East Devon and Exeter being just over 3,000. But the population is growing, and will increase in the future. The Islamic Centre in Exeter serves as the cultural centre for the community of Devon, and arguably for the south west peninsula. The community already has a challenge with finding burial plots and the problem is becoming acute. Muslims are not allowed to cremate their dead. Presently there is no dedicated graveyard or burial section for Muslims in East Devon. Exeter has only a modest short-term provision of less than 40 plots. The community needs a provision to meet the inevitable requirements of burying our dead. Although one may assume based on burial capacity for graves in Sidmouth, Seaton and Sidbury

cemeteries the district may have availability at least in the short term for the generic population, that provision does not meet the specific needs of the Muslim community, nor are those facilities close to the community that is centred on Exeter and increasingly on the eastern edge of the city and in the west end of the district. With the planned second new community and the urban extensions around Exeter there is an essential case to assess the longer needs of the Muslim Community and to identify that need along with the other social and community infrastructure to be captured in the master plan and infrastructure requirements. The Islamic Centre for Exeter and the South West could provide more specific details, and I would be happy to present material and to explain the distinctive needs of the Muslim community.

Full name: Karime Hassan MBE

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:

[Representation on behalf of Exeter Rugby Group based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation]

The consideration set out above [see respondent response to Policy WS01 and full uploaded representation] in relation to the timely delivery of infrastructure equally applies to Strategic Policies WS10: Development next to the M5 and north of Topsham. It is also the case in relation to that policy that a master plan will need to be developed in conjunction with joint work between Exeter City Council and East Devon District Council on a formal Development and Infrastructure Delivery Framework. This requirement is supported.

Andrew Hatfield

Full name: Andrew Hatfield

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove exmo_20 from local plan Exmouth can not cope with size of the population in the local area and the facilities, this will only increase pressure on the town in so many areas.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: i care about my local area, and what this brings to the future for the next generation including my own children, with over-crowding Exmouth and spoiling this lovely town.

Emma Hayes

Full name: Emma Hayes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: In relation to Feniton, it's unclear as to whether the draft local plan has been developed in a legally compliant way. Without personal legal knowledge and as a member of the public, I do not feel qualified to make comment on this section.

- However, in previous consultations, emails, comments and a petition signed by 500+ residents was not taken into consideration as it was not submitted via Common Place.

- These vital public comments were not reported by EDDC to the Strategic Planning Committee, effectively ignoring the views of Fenitonians.

- EDDC's preferred method of commenting is the Common Place System. It is complex and extremely time consuming, effectively deterring Jo Public from 'Having Your Say' and making their opinions known. This is discriminatory and undemocratic, and contravenes British Values.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Flooding:

- It is well documented that Feniton regularly floods.
- It would appear that East Devon District Council (EDDC) has not considered the historic evidence of flooding, including raw sewage which appears to be an increasing incidence, with individuals experiencing roads and gardens impacted during heavy rain.
- More development equals more flooding.
- With previous developers, promises of flood risk alleviation measures have not transpired.
- The Flood Alleviation Scheme (FAS) has only been designed for the current number of homes in Feniton. It will only divert flood water around the eastern side of the village, leading to increased flooding at Pattersons Cross, the main access route to the village, from the A30.
- In times of heavy rain, Pattersons Cross already becomes impassable, (without the additional flood water from the FAS).
- The bridge before the A30 at the other end (past Fenny Bridges) also floods very badly and increasingly frequently, and other roads are more like unmetalled roads as

they are in such a state of disrepair due to erosion and potholes with increasing amounts of traffic.

- Despite millions of public money being spent on it, currently there is no evidence of the FAS's efficiency.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Sewage:

- It's a well known fact that there is an unresolved capacity in our sewerage system causing outflow storm water to enter the water drains, exacerbating the incidence of sewage flooding.
- It's well documented that roads and homes often flood with raw sewage.

References: Chapter 2 The Vision, Objective 1 Chapter 7 Flood Risk Strategic Policy
AR01 – C

Lack of Sustainability:

- At the 2014 Super Enquiry, the Planning Inspector determined, with EDDC agreeing, that Feniton was not a sustainable location for further development.
- Nothing, apart from the untested Flood Alleviation Scheme (FAS), has changed within the village to address the issues raised in said Super Inquiry.
- Lack of adequate public transport.
- All of the roads into Feniton are narrow with pinch points, unlit and unsuitable for heavy traffic.
- Feniton has recently had an insight to the ramifications of increased traffic when the Ottery Road/Green Lane junction was closed for the FAS works. At times delays getting in and out of the village were extensive. I live in the old village and the road was constantly backed up, the school bus was so late that I was taking the children to school and at times it took over 40minutes due to heavy plant not being able to pass and multiple cars on the road from Fenny Bridges backed up to Feniton. The road was dangerously overpopulated with cars, lorries, farm machinery etc. with no traffic system or adequate passing places and huge disruption day and night.
- When Pattersons Cross floods, (as is expected during heavy rain as a result of the FAS), all vehicles will have to access the village and surrounding areas via Feniton

Old Village, or via the network of lanes and villages leading from A373 and M5. These lanes are highly unsuitable and unsafe for heavy traffic.

- Feniton Primary School is at capacity and in great need of a building upgrade.
- Local GP services are at capacity.
- There has been a disregard of evidence and planning history indicating that this scale of development in Feniton is unsustainable. The proposals for Feniton are not consistent with the local plan's stated vision and strategy and by extension with national policy.
- The only infrastructure noted in the draft local plan is for 1060m new water mains to be laid by 2035.

References: Infrastructure Delivery Plan – Utl-1 Sustainability Appraisal Objectives 4, 5, 9, 10 and 13. Chapter 3 – 3.38, 3.39, 3.40, 3.44, 3.45

Disproportionate allocation of houses compared to local need:

- Funded by EDDC, Devon Communities Together (DCT) identified a local need for only 13 dwellings up to the year 2027.
- The number of houses planned for Feniton in the draft plan is disproportionate and doesn't align to the DCT survey, funded by EDDC.
- When the Strategic Planning Committee realized the number of houses allocated for Feniton were far greater than local need, the Chairman instructed the Officer to rewrite the Strategic Policy SP01 in the Regulation 19 version, in order to justify the increased development proposed for Feniton. There is now a mismatch between vision and strategy.
- Proposed development in Feniton is not 'limited' but huge for a tier 4 village.

References: Chapter 3 – 3.4 Hierarchy of Settlements Chapter 5 – Strategic Policy SD18 – Development actions at Feniton. Strategic Policy SP01 – C, D, E.

Employment site Otry_20:

- Site Otry_20 is an unsafe location. The entrance to the site is off Green Lane, a mostly single track road, some parts not wide enough for a car to pass a pedestrian without said pedestrian leaning back into the hedge. It is unlit, has pinch points, blind bends, distinct lack of pavements and two single track, over the rail line bridges, one with a blind bend. There is a part that is an ancient sunken portion subject to rock falls, blocking the lane. There is a video that can be viewed on Youtube - <https://www.youtube.com/watch?v=6q7DQ6mpgh4> detailing some of the issues with Green Lane. The blind bends on either end of this lane are especially dangerous.
- Feni_08 is also accessed via Broad Lane which has very similar issues to Green Lane.
- Site Otry_20 was brought forward for consideration after the Regulation 18 draft consultation. It could be viewed that EDDC has not had sufficient time to consider all the evidence effectively.
- The size of Otry_20 does not align with EDDC's Spatial Strategy and is totally disproportionate to the scale of Tier 4 Feniton.
- It has a disproportionate allocation for industrial, warehousing and distribution than employment sites allocated for the Principle Centre Tier 1 Exmouth, in Tier 2 Axminster and Tier 3 Ottery and Seaton.

References: Chapter 2 The Vision – 2.10, Objective 1, Objective 2, Objective 9, Objective 10 Chapter 3 The Spatial Strategy SP01- C, D, E Service Villages 5.11 – SD18 – Otry_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a sustainable plan, better reflect the Tier 4 status of Feniton and realign the Strategy and Vision, until adequate infrastructure and mitigation has been put into place:

- Removal of Feni_08 from the draft local plan, or at least a reduction in the number of houses allocated for Feni_08.
- Removal of Otry_20 from the draft local plan.

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Duty to co-operate refer to councils co-operating with each other and isn't really relevant to Feniton.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Via the Parish Council to have the views of Feniton Residents represented

Mary & Terry Hayman

Full name: Mary & Terry Hayman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise.

If this development has to go ahead then we will also need to have a plan in place that gives Exmouth residents preferable treatment to buy the houses, especially the affordable ones so that our youngsters have first choice.

The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

The main Budleigh road is already very busy and of course, if this new estate goes ahead a lot of extra traffic will be added.

Exmouth already has a Sewage problem and the question is , will extra housing and residents make the problem worse? If so, tourists will be put off coming to our seaside town in future.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Please keep our beautiful countryside on the outskirts of the town and make full use of vacant buildings in the town area, such as the police station and magistrates court.

Pamela Hayman

Full name: Pamela Hayman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This village cannot take anymore building, sewage & traffic!!

Robert Hazell

Full name: Robert Hazell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I am writing to express my view and concerns and strong objection regarding the Strategic Allocation in Whimble of Whim_11 (land at Station Road) Whimble.

I support Whimble Parish Councils responses in full, further as a resident of Slewton Crescent, number 27 I have first hand experience of Cranny Brook flooding on an increasingly regular basis, my house is immediately adjacent to Cranny Brook, it has broken it's bank on 10 occasions in the winter of 2024/25 the highest recorded in the 28 years I have been resident. Any development upstream which Whim_11 is can only increase the risk of flooding to mine and other properties.

Whim_11 is already subject in part to flooding as confirmed by the Environment Agency, development would increase risk of adding in a world where weather patterns are changing and increased flood risk is widely known and expected to make vulnerable areas more vulnerable.

My objection is on the grounds of soundness in that the allocation and policy is not based on solid evidence. The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024. Professional planning officers identified and assesses the potential sites in Whimble and using their

professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not. In the case of Whim_11, Planning Officers recommended that the site be allocated for the following reason: 'The site is considered to be the best option for accommodating an appropriate scale of development for Whimble. It is well related to the exiting settlement pattern and benefits from relatively good pedestrian access to facilities in the village centre. Although the northern part of the site is at risk of flooding, there is potential for the development of around 30 dwellings on the remainder of the site.' Representatives from the Parish Council were not able to attend the Strategic Planning Committee on 1 October 2024, but instead submitted a statement, which was read out by a Democratic Services Officer. The Whim_11 site in Station Road (which is also known locally as the old cricket ground) has been put forward for development several times before when East Devon District Council (EDDC) have called for sites. In the 1995, 1999 and 2015 Local Plans the proposed site was rejected on several legitimate planning grounds and the site was not allocated in the Local Plan. The Parish Council asked the Strategic Planning Committee to give an explanation as to what has changed since this site was previously rejected that now makes it suitable for allocation. To date, no response has been received from EDDC.

Trees and Wildlife Habitat The site contains a number of mature trees several of which have existing Tree Preservation Orders (TPOs). The tree in middle of old cricket pitch is unique, mentioned in Wisden and should be preserved as of historic importance. In the EDDC Site Selection Report for Whimble, there does not appear to be any mention of the tree in the middle of the old cricket pitch and allocation on this site would surely be subject to the provision of EDDC Emerging Local Plan Policy PB08: Trees, Hedges and Woodland on development site. The DEFRA website shows the site and north east of site as Woodland Priority Habitat and Woodland Improvement Area, Priority Habitat (woodland and orchard), and a national habitat and network enhancement zone 1. Any development of this site would be contrary to the EDDC Emerging Local Plan Policies PB02: protection of regionally and locally important wildlife sites and PB03: protection of irreplaceable habitats and important features.

Flooding It is noted that the site is already subject to (partial) flooding (confirmed by the Environment Agency), and any development would run the risk of adding to this with impact both on the site and further downstream. There is no evidence to suggest that officers have carried out further work relating to the flood risk before consideration was given to a partial allocation. Therefore, Whimble Parish Council suggests that there is no sound evidence for allocating this site in the EDDC Emerging Local Plan and that it is contrary to Policy AR01: Flooding.

Access to the site and Infrastructure The exit from the site is on to a single track road with a blind corner – not only would this create an immediate local problem but the potential to add 33 houses on this site would seriously compromise an already congested and busy exit route from the village (continuing through the Centre of the village – along Church Road and then on to the old London Road. Church Road is the main route into the Village and is a narrow and dangerous

road. The section of Church Road nearest to the Square and village shop is single track road with houses either side of the road. There is no pavement along the stretch of Church Road to The Square and School Hill. The Parish Council and Villagers have raised concerns about the volume and speed of traffic on that road. The Parish Council are so concerned about the volume and speed of traffic along Church Road that it has convened a Community Speed Watch Group to monitor the traffic and speed along that road. There is no capacity to add a footpath to exit and continue from this site. All access routes are narrow country lanes, so development would exacerbate the existing problems of public safety (given the lack of footpath), traffic congestion and noise. This site was considered unsuitable for development in 1995 due to traffic issues. What has changed since then which now makes this site suitable? This question was asked to the EDDC Strategic Planning Committee meeting on 1 October 2024 but, to date, no response has been received. The Parish Council has been advised that the owners of the site do not own the hedge bordering the site. Also another local resident owns land adjacent to the site that would be needed for the installation of a footpath, and he has advised that he will resist any land grab. Whimble Parish Council feels that this site is not sustainable and therefore should not be allocated in the EDDC Emerging Local Plan.

Land of Local Importance In 1993 The EDDC Chief Engineer and Planning Officer wrote to a local resident to confirm that the Richard Whiteway Memorial Ground was inset as “Land of Local Importance” (copy of the letter has been provided). The letter states ‘the intention of the designation is that the land should not be built upon’, and ‘the designation means that the land can only be used for activities which retain its open nature. Any applications to develop the land would be resisted’. Whimble Parish Council asks what has changed since 1993 to suggest that this site should now be allocated in the Emerging Local Plan? This question was asked to the EDDC Strategic Planning Committee meeting on 1 October 2024 but, to date, no response has been received.

Developing this site would be contrary to Policy OL06: Land of Local Amenity Importance and Local Green Space. Spatial Strategy Whimble is a is a 'Tier 4' settlement, where the draft local plan seeks to promote limited development to meet local needs. The development of up to around 33 homes on Whim_11 is consistent with that strategy. Whimble Parish Council challenges this assumption. As part of the work on the Whimble Neighbourhood Plan, the Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states ‘The survey identified a need for at least 4 affordable homes within the next 5 years.’ Whimble Parish Council does not class a total allocation of 83 homes in Whimble to be ‘limited development’ (Whim_11 total of 33 homes; Whim_08a total of 50 homes), especially when the Whimble Housing Needs Report lists a significantly lower figure. The Parish Council also suggests that the allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01: Housing to address needs, which states ‘This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other

evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.’ In addition to this, there are developments planned in neighbouring areas e.g. Cranbrook. This includes the current Cobdens Expansion of Cranbrook, part of which is still in the Whimble Parish Area, where 1500 houses, a school and a travellers site have already been approved by the Strategic Planning Committee. These sites have a far better infrastructure than Whimble Village so why has the additional housing requirement not been allocated at these sites? Other Comments The Parish Council and local residents in Whimble have not said that they are against development. But the issue is the size and location of the development. It is the view of the Parish Council that development would be better placed elsewhere in Whimble, or in Cranbrook or elsewhere in the district where there is appropriate infrastructure. As set out earlier there is no sound justification as to why the Strategic Planning Committee decided to go against the professional judgement of the Planning Officers and allocated this site in the Emerging Local Plan. Also, in terms of soundness, the Strategic Planning Committee does not appear to have fully considered a number of other options that could have been chosen. Whimble Parish Council is looking at Site Allocations as part of the evidence base for its Neighbourhood Plan. The Parish Council is considering a number of sites, which are: Whim_03 Land to the south of Grove Road Whim_07 Land south of Broadclyst Road Whim_13 Land north side of Grove Road Whim_18 Land to the east of Church Road Whim_20 Land to the north of Plumtree Lane The Parish Council’s preference would be that a site is allocated to the east of Church Road so that it is nearer to the established infrastructure near the Hand and Pen. It is the view of the Parish Council that further work should be carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimble. Summary Whimble Parish Council believes that policy SD29: Strategic Allocations for Whimble, specifically site Whim_11 is not sound, as the decision to allocate failed to consider the protected tree in the middle of the site, which is protected by a Tree Preservation Order (TPO). Also, there is no mention of the fact that previously the EDDC Planning Department designated this site as “Land of Local Importance” which should not be built on and should be used for activities which retain its open nature. Therefore, Whimble Parish Council and local residents want to see the modification of site Whim_11 being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the district (outside of Whimble Village), where there is appropriate infrastructure.

wes healey

Full name: wes healey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh salterton than to Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, beach etc)will be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to the coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan

EXMo 20 would increase the need for car travel and increase traffic congestion, in conflict with Para. 11.2. The isolated location is unsustainable development as people will need to travel much further than 800m to existing key services and facilities, contrary to Para 11.6. It is too far and too steep for walking or cycling, contrary to Pol TR01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXmo 20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mrs Dorothy Heath

Full name: Mrs Dorothy Heath

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Potential harm to the Pebblebed Heaths is a huge risk and is contrary to Policy PB01, and would fragment an important wildlife corridor (see Para 13.23 of the plan). Threat to well established woodland and habitats is detrimental to the environment (para 13.9 of the plan). It poses a threat to the tranquility, wildness and dark skies in the area, which are a major natural asset (contrary to Policy OL01) There is also a risk of flood risk as the proposed development is on Exmouth's main water catchment area. (Policy ARO1B). The development will lead to a huge increase in traffic and the use of cars for local journeys. It is unrealistic to think that most people will rely on cycling, walking or even public transport. (Paras 11.2, 11.6 and Policy TR01). Not only is this in contravention of local policies on sustainability, it also presents an increased risk of accidents and air pollution, especially in the area around Southern Wood which already has problems arising from excessive traffic on Meadow View Road. Given its proximity to Budleigh, many people will doubtless wish to use Budleigh infrastructure, which would result in urban sprawl/coalescence of two separate communities, which is contrary to Policy OL05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not use Southern Wood as an access site - it is totally unsuitable for this purpose. Reduce the size of EXMO_20.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mr David A Heatherington

Full name: Mr David A Heatherington

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: the main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh the most convenient and accessible town. The services and infrastructure of Budleigh would be the preferred choice for residents of Exmo_20. This undermines the settlement hierarchy and would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan Exmo_20 would have a detrimental effect on the adjacent designated wildlife sites and destroy the tranquillity wildness and dark skies of the countryside which is contrary to POLICY OL01 Exmo_20 will be on heavy clay subsoil with ineffective soakaways, and would exacerbate the already identified downstream floodrisk along Withycombe brook through Exmouth, which is already beyond its design capacity EXMO_20 would increase the need for car travel and increase traffic congestion. People would need to travel much further than 800m to existing key services and facilities. The site is too far and too steep for normal foot traffic and cyclists

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Cathryn Heggadon

Full name: Cathryn Heggadon

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
EXMO_20 is nearer to Budleigh than Exmouth. Services and infrastructure in Budleigh is not equipped to deal with the influx. It is contrary to Policy OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Christina Hellier

Full name: Christina Hellier

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Sarah Hemingway

Full name: Sarah Hemingway

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposal at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebbled Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy,

Exmou_20 would destroy the "tranquillity, wilderness and dark skies" of the countryside, which is contrary to POLICY OL01.

Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, and veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

The Habitats Regulation Assessment (30.1.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to....air quality (East Devon Pebblebed Heaths SAC/SPA). Exmou_20 is in conflict with POLICY OL09 and POLICY PB04.

Exmou_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

Exmou_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

Exmou_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

The main access point of Exmou_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from local plan or reduce its size

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jeffrey Steven Higgins

Full name: Jeffrey Steven Higgins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: *

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. * Exmo_20 would destroy the "tranquillity, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. * Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

* The Habitats Regulations assessment (30.01.25) confirms that there is?"currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths?SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

" Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HEO. " Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY ARO1B. * Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use

walking or cycling as their choice of transport. This is contrary to POLICY TR01. * The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan. For Q3c you can either leave it blank or put in a suggestion (examples below which you might want to use)? Remove Exmo_20 from the Local Plan * Reduce the size of Exmo_20 * Do not access the site via the B3179 * Do not access the site via Southern Wood * Revert to Exmo_20b as previously proposed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jade Higham

Full name: Jade Higham

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan, ? Do not access the site via Southern Wood,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Paul Ockleford Hiley

Full name: Paul Ockleford Hiley

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Budleigh is a small town with limited access to infrastructure including doctors, parking, schools and beach access. If EXMO_20 is introduced its nearness to Budleigh would encourage much higher use of Budleigh as it is nearer than Exmouth. This undermines the settlement hierarchy and would be contrary to POLICY OLO5 of the local plan. Exmo_20 is in conflict with POLICY OLO9 and if instigated would have a detrimental effect on our present community in Budleigh where many elderly and frail people live at present. The substantial increase in traffic would be detrimental to the town which is already jammed in the summer months and parking would become a nightmare. There are many reasons for refusing this development to go ahead, both legal and social. The council has a responsibility to protect the residents of its area and this development would be detrimental and life changing for both the beautiful area of Budleigh and its many residents.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan and find an alternative site.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Margaret Hiley-Payne

Full name: Margaret Hiley-Payne

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

Gazelle Hill

Full name: Gazelle Hill

Other party name (if relevant): Mark Glanville

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to

Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ? Remove Exmo_20 from the Local Plan, ? Reduce the size of Exmo_20, ? Do not access the site via the B3179, ? Do not access the site via Southern Wood, ? Revert to Exmo _20b as previously proposed,

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Jason Hill

Full name: Jason Hill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

- Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

- Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9.

- The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

- Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02.

- Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B.

- Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

- The main access point of Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of Exmo 20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Terence David Hill

Full name: Terence David Hill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: As a Whimble resident I strongly object to the plan to develop Whim08 for 50 houses and a 'community orchard/open area'.

This plan was rejected unanimously in whole or in part at a Strategic Planning Meeting in October 2024 in accordance with Planning Officer recommendations and yet a month later the same committee unanimously voted for the proposal that was proposed by the Chair of said committee who lives in Whimble.

A speaker justified the proposal with comments regarding the facilities available in the village including:- a Post Office (there is not one!) a school (now full due to overspill from Cranbrook and already using a village hall as an overflow that should be for the use of all residents resulting in the community having to raise £400,000 to extend the hall to make it available for all) a shop (up for sale and no guarantee that it will continue) a Railway Station with good services (not a good service and no parking available already in this area) and all of these facilities are isolated from Whim08 by a narrow often single track Church Road that is poorly lit with no pavements. There is no suitable bus service from Whimble to anywhere.

It was also stated in the November Strategic Committee meeting that once the 50 houses are built there could be more development of the site on the other side of the flood plain towards Cranbrook so clearly this proposal is just a lever to over develop a small village and join it up to Cranbrook on what is a Green Wedge.

One aspect that has been thrown in without any apparant discussion or consideration is that attached to this development could be a community orchard/open area. It is not clear what use this would be put to but would border an existing historic orchard that continues around the back of Bramley Gardens and is a haven for wildlife. This area could not survive as such if an open area were developed next to it as inevitably children would use this orchard as an extension of the 'open area' and if that becomes used as a play area and dog walking area it is inevitable that Bramley Gardens could become a parking area for these activities for those coming from other parts of the village rather than the Whim08 development.

If EDDC are short on their needs then surely other areas of Whimble Parish should be considered nearer to Hand & Pen where there is a good bus route and is close to local facilities at Cranbrook.

The Parish Council have identified that 5 affordable houses would be needed in the near future and yet 15 would be included in the 50 house allocation for Whim08.

In conclusion this proposal has not been given adequate diligence, goes against Planning Officers recommendations, is not a suitable , safe site and seems to be a kneejerk reaction to Government prssure to meet targets regardless of the practical issues that exist.

Sue Hill

Full name: Sue Hill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live in Whimble and I object to the plan to develop Whim08 for 50 houses and a 'community orchard/open area'.

This plan was rejected unanimously in whole or in part at a Strategic Planning Meeting in October 2024 in accordance with Planning Officer recommendations and yet a month later the same committee unanimously voted for the proposal that was proposed by the Chair of said committee who lives in Whimble.

A speaker at the November meeting justified the proposal with comments regarding the facilities available in the village compared to Feniton including:- a Post Office (there is not one!) a school (now full due to overspill from Cranbrook and already using a village hall as an overflow that should be for the use of all residents resulting in the community having to raise £400,000 to extend the hall to make it available for all) a shop (up for sale and no guarantee that it will continue) a Railway Station with good services (not a good service and limited parking available) and all of these facilities are isolated from Whim08 by a narrow often single track Church Road that is poorly lit with no pavements unlike the area around Feniton Railway Station that has wide roads, pavements and decent station parking. There is no suitable bus service from Whimble to anywhere.

It was also stated in the November Strategic Committee meeting that once the 50 houses are built there could be more development of the site on the other side of the

flood plain towards Cranbrook so clearly this proposal is just a lever to over develop a small village and join it up to Cranbrook on what is a Green Wedge.

One aspect that has been thrown in without any apparant discussion or consideration is that attached to this development could be a community orchard/open area. It is not clear what use this would be put to but would border an existing historic orchard that continues around the back of Bramley Gardens and is a haven for wildlife. This area could not survive as such if an open area were developed next to it as inevitably children would use this orchard as an extension of the 'open area' and if that becomes used as a play area and dog walking area it is inevitable that Bramley Gardens could become a parking area for these activities for those coming from other parts of the village rather than the Whim08 development.

If EDDC are short on their needs then surely other areas of Whimble Parish should be considered nearer to Hand & Pen where there is a good bus route and is close to local facilities at Cranbrook.

The Parish Council have identified that 5 affordable houses would be needed in the near future and yet 15 would be included in the 50 house allocation for Whim08.

In conclusion this proposal has not been given adequate diligence, goes against Planning Officers recommendations, is not a suitable , safe site and seems to be a kneejerk reaction to Government pressure to meet targets regardless of the practical issues that exist.

Full name: Terence David Hill

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Whim08a is not suitable for development because

1. the entrance via Bramley Gardens off Church Road is totally unsuitable as an access to further development as it enters Church Road on a blind bend.

2. The development would be served by a village but would be isolated from the village amenities by a narrow Church Road with no pavements and no street lights.

3. Access to the village from Hand and Pen is a winding narrow lane with some single track elements that are already dangerous for existing village residents.

4. The provision of turning an existing traditional orchard to the north of the development into a community orchard with open space for the use of the new development would seem to not only destroy the idea of retaining a traditional orchard but would surround an existing development of mainly retirement bungalows in Bramley Gardens with open spaces no doubt used for children's play areas and dog walking resulting in noise plus Bramley Gardens being used a parking area as there is currently an access to the orchard between 11 and 12 Bramley Gardens.

4.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Keep the area currently designated as traditional orchard as such and not turn it into an open space

for community use. Develop open space elsewhere around the new development. Change the access to the WHIM08a development along Church Road nearer to Hand and Pen and seal off the road access from Bramley Gardens leaving only pedestrian access from Bramley Gardens to the new development. To enable residents to access decent bus services Church Road from Bramley gardens to Hand and Pen needs a footpath as a full bus service only runs from Hand and Pen. Following a Community Speed Watch initiative just commencing the Highways Dept needs to reduce speed limit to 30mph until it meets the 20mph limit just past Bramley Gardens and to improve signage to encourage priority to one direction of traffic in the village where it is single track. This village has a major accident waiting to happen and further development will make this situation even worse.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The villagers have already demonstrated their desire to avoid such development in previous consultations. The proposal to develop WHIM08a and take over an historic orchard was hastily decided with a throw away line at a Strategic Planning Committee meeting without any discussion about the difficulties of this idea and with statements made by Councillors about the facilities in the village being incorrect and misleading i.e There is no Post Office in the village, there is not a 20mph limit at the junction of Church Road and Bramley Gardens, the proposed development would be isolated from the village by narrow roads with no footpath and no street lights. The decision appears to be riding roughshod over practical issues and the wishes of a lot of villagers.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Richard Hillman

Full name: Richard Hillman

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. Exmo_20 would destroy the tranquility, wildness and dark skies of the countryside which is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 The Habitat Regulations assessment (13.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects on St John in the Wilderness Grade 2 listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a sub soil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would have to travel much further than 800m to existing key services and facilities contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctors, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY

OLO5 of the local Plan. IN CONCLUSION ,ITS IMPORTANT TO REMEMBER THAT ONCE IT IS GONE ,IT IS GONE FOREVER.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Terence Hitchins

Full name: Terence Hitchins

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 would have a detrimental effect on this open countryside site and the adjacent internationally designated wildlife sites, eliminating the "tranquility, wildness and dark skies", which is contrary to POLICY OL01

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revert to Exmo_20b as previously proposed

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Christopher Roy Holland

Full name: Christopher Roy Holland

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR03

2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not legally compliant. Please be as precise as possible.:

It appears unreasonable to disallow an existing owner of a property within the area designated for planning constraint from making adjustments to their own property in order to meet their own changing needs. Given that there are many retirees resident within this area, changing needs relating to mobility and access or other health issues are relatively likely to occur.

2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It would seem to be reasonable to allow existing property owners to be able to apply for and where appropriate receive planning approval for changes to their own properties.

3. Do you consider that this part of the Adapting to Climate Change chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.: The development and formulation of the local beach management plan for the Eastern end of Sidmouth involved the expenditure of substantial sums of money to acquire two separate detailed and local consultancy reports on the process and rates of local erosion and how best to control. This data must be more specific to our local problems and needs than the later Plymouth University paper which is much more general in nature covering the whole miles of the S.W. coast line.

3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: Revert to using the detailed local consultancy reports in formulating our local policies. To also take account of the beach management plan and the effects of this plan on reducing coastal erosion once completed.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Adrian Holloway

Full name: Adrian Holloway

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

There has been little publicity in Topsham about the suggested developments of WS10 and WS15, with many residents completely unaware of what is being proposed in Topsham. Communication did appear to have taken place in East Devon. As those facing the disruption, and quality of life, Topsham people are entitled to have long term impacts properly presented in order for them to comment. There appears to be a perception among some living locally (in Topsham) that the Exeter Local Plan, consulted on three months ago was the main document outlining future large scale, generational development.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: reconsult, or extend the consultation, this time promoting the consultation to topsham residents also.

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: WS15

Development so far at darts farm appears to be about creating an exclusive enclave for an affluent few, while imposing an insensitive visual disturbance for local resident and for nature. I cant imagine that new development will be any less insensitive. Running illuminations throughout the night building scale buildings and car parking in green field

sites, adjacent to ecologically sensitive areas does not offer a sustainable future resource

WS10 The character of topsham has already been changed forever by insensitive and greedy development. If development must go ahead in this area, to at least preserve some of the character of the traditional Devon landscape by keeping development to the west of clyst road not to the east of clyst road (where the river clyst is). Clyst lane itself is an important wildlife corridor and feature of the historic landscape. Its unsympathetic modification of this route will further erode the traditional character of Topsham and the surrounding area. Please preserve clyst lane and if development must be build, divert the trafficked road through the development, so that the developers who stand to make the profit can bear the cost and effort of creating suitable infrastructure.

W10

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Avoid further development of darts farm and preserve the landscape in that location

Preserve Clyst Lane and its historic feel.

Do not develop east of clyst lane.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Danny Holness

Full name: Danny Holness

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: 1) Local roads, paths, and parks are wholly inadequate. The intersection between Meadow Acre Road and Hayne Lane is already an accident waiting to happen, with vehicles travelling south on Hayne Lane routinely turning left to continue on the road at dangerous speed. Vehicles also routinely enter and exit Meadow Acre Road at too high a speed, positioned centrally in the road (no markings) as if no possibility of encountering oncoming traffic. There are too many vehicles parked on Meadow Acre Road impeding traffic. The road under the train bridge is single pass only, and presumably too low for a double decker bus to pass. The right of way is frequently ignored, and clearly unable to cope with additional traffic of the scale proposed. The proposed path under the railway line is currently sectioned off and in disrepair. There is a distinct lack of functional playgrounds and local rights of way (walking paths) and no safe route to walk/cycle into Gittisham or enjoy the countryside. Devonshire Road, through Heathpark Industrial Estate is in great disrepair (potholes/fissures), and already unable to cope with peak time traffic e.g. 5pm Mondays, Tuesdays, Wednesdays, and Thursdays. The A30 cannot be accessed from Hayne Lane and so the proposed development will increase the congestion exponentially. 2) Already struggling (and potentially impacted) local services. Honiton Surgery is routinely uncontactable and online based. As an adult you can only get an appointment in a timely manner in extreme situations. How will the surgery service additional residents in their catchment. The suggestion is farcical. Similarly, one can't join NHS Dentists anymore. The waiting list is a matter of decades not years. I also fail to see how Littleton Nursery / Primary School can provide sufficient additional capacity, similarly private nurseries like Sunny Days are struggling to facilitate enough places with the Government's expanded free childcare hours. Honiton Community College has closed its sixth form. There really is not the infrastructure and services present locally to justify this scale of development.

Ultimately we do need new homes, but they need to be adequately serviced and an improvement to communities, not a detriment. A proposed shop is insuffice.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Local infrastructure/road safety and services need to be dramatically improved. A two way road and path would be needed added under the railway, a safe walking path provided to Gittisham, and functional parks/playgrounds installed. Local GP and dentist services would need to be vastly improved, and Schools supported.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: 1)

Local roads, paths, and parks are wholly inadequate. The intersection between Meadow Acre Road and Hayne Lane is already an accident waiting to happen, with vehicles travelling south on Hayne Lane routinely turning left to continue on the road at dangerous speed. Vehicles also routinely enter and exit Meadow Acre Road at too high a speed, positioned centrally in the road (no markings) as if no possibility of encountering oncoming traffic. There are too many vehicles parked on Meadow Acre Road impeding traffic. The road under the train bridge is single pass only, and presumably too low for a double decker bus to pass. The right of way is frequently ignored, and clearly unable to cope with additional traffic of the scale proposed. The proposed path under the railway line is currently sectioned off and in disrepair. There is a distinct lack of functional playgrounds and local rights of way (walking paths) and no safe route to walk/cycle into Gittisham or enjoy the countryside. Devonshire Road, through Heathpark Industrial Estate is in great disrepair (potholes/fissures), and already unable to cope with peak time traffic e.g. 5pm Mondays, Tuesdays, Wednesdays, and Thursdays. The A30 cannot be accessed from Hayne Lane and so the proposed development will increase the congestion exponentially. 2)Already struggling (and potentially impacted) local services. Honiton Surgery is routinely uncontactable and online based. As an adult you can only get an appointment in a timely manner in extreme situations. How will the surgery service additional residents in their catchment. The suggestion is farcical. Similarly, one can't join NHS Dentists anymore. The waiting list is a matter of decades not years. I also

fail to see how Littleton Nursery / Primary School can provide sufficient additional capacity, similarly private nurseries like Sunny Days are struggling to facilitate enough places with the Government's expanded free childcare hours. Honiton Community College has closed its sixth form. There really is not the infrastructure and services present locally to justify this scale of development. Ultimately we do need new homes, but they need to be adequately serviced and an improvement to communities, not a detriment. A proposed shop is insuffice.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Local

infrastructure/road safety and services need to be dramatically improved. A two way road and path would be needed added under the railway, a safe walking path provided to Gittisham, and functional parks/playgrounds installed. Local GP and dentist services would need to be vastly improved, and Schools supported.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: 1)

Local roads, paths, and parks are wholly inadequate. The intersection between Meadow Acre Road and Hayne Lane is already an accident waiting to happen, with vehicles travelling south on Hayne Lane routinely turning left to continue on the road at dangerous speed. Vehicles also routinely enter and exit Meadow Acre Road at too high a speed, positioned centrally in the road (no markings) as if no possibility of encountering oncoming traffic. There are too many vehicles parked on Meadow Acre Road impeding traffic. The road under the train bridge is single pass only, and presumably too low for a double decker bus to pass. The right of way is frequently ignored, and clearly unable to cope with additional traffic of the scale proposed. The proposed path under the railway line is currently sectioned off and in disrepair. There is a distinct lack of functional playgrounds and local rights of way (walking paths) and no safe route to walk/cycle into Gittisham or enjoy the countryside. Devonshire Road, through Heathpark Industrial Estate is in great disrepair (potholes/fissures), and already unable to cope with peak time traffic e.g. 5pm Mondays, Tuesdays, Wednesdays, and Thursdays. The A30 cannot be accessed from

Hayne Lane and so the proposed development will increase the congestion exponentially. 2) Already struggling (and potentially impacted) local services. Honiton Surgery is routinely uncontactable and online based. As an adult you can only get an appointment in a timely manner in extreme situations. How will the surgery service additional residents in their catchment. The suggestion is farcical. Similarly, one can't join NHS Dentists anymore. The waiting list is a matter of decades not years. I also fail to see how Littleton Nursery / Primary School can provide sufficient additional capacity, similarly private nurseries like Sunny Days are struggling to facilitate enough places with the Government's expanded free childcare hours. Honiton Community College has closed its sixth form. There really is not the infrastructure and services present locally to justify this scale of development. Ultimately we do need new homes, but they need to be adequately serviced and an improvement to communities, not a detriment. A proposed shop is suffice.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Local infrastructure/road safety and services need to be dramatically improved. A two way road and path would be needed added under the railway, a safe walking path provided to Gittisham, and functional parks/playgrounds installed. Local GP and dentist services would need to be vastly improved, and Schools supported.

Full name: Danny Holness

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: 1) Local roads, paths, and parks are wholly inadequate. The intersection between Meadow Acre Road and Hayne Lane is already an accident waiting to happen, with vehicles travelling south on Hayne Lane routinely turning left to continue on the road at dangerous speed. Vehicles also routinely enter and exit Meadow Acre Road at too high a speed, positioned centrally in the road (no markings) as if no possibility of encountering oncoming traffic. There are too many vehicles parked on Meadow Acre Road impeding traffic. The road under the train bridge is single pass only, and presumably too low for a double decker bus to pass. The right of way is frequently ignored, and clearly unable to cope with additional traffic of the scale proposed. The proposed path under the railway line is currently sectioned off and in disrepair. There is a distinct lack of functional playgrounds and local rights of way (walking paths) and no safe route to walk/cycle into Gittisham or enjoy the countryside. Devonshire Road, through Heathpark Industrial Estate is in great disrepair (potholes/fissures), and already unable to cope with peak time traffic e.g. 5pm Mondays, Tuesdays, Wednesdays, and Thursdays. The A30 cannot be accessed from Hayne Lane and so the proposed development will increase the congestion exponentially. 2) Already struggling (and potentially impacted) local services. Honiton Surgery is routinely uncontactable and online based. As an adult you can only get an appointment in a timely manner in extreme situations. How will the surgery service additional residents in their catchment. The suggestion is farcical. Similarly, one can't join NHS Dentists anymore. The waiting list is a matter of decades not years. I also fail to see how Littleton Nursery / Primary School can provide sufficient additional capacity, similarly private nurseries like Sunny Days are struggling to facilitate enough places with the Government's expanded free childcare hours. Honiton Community College has closed its sixth form. There really is not the infrastructure and services present locally to justify this scale of development. Ultimately we do need new homes, but they need to be adequately serviced and an improvement to communities, not a detriment. A proposed shop is insuffice.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1) Local roads, paths, and parks are wholly inadequate. The intersection between Meadow Acre Road and Hayne Lane is already an accident waiting to happen, with vehicles travelling south on Hayne Lane routinely turning left to continue on the road at dangerous speed. Vehicles also routinely enter and exit Meadow Acre Road at too high a speed, positioned centrally in the road (no markings) as if no possibility of encountering oncoming traffic. There are too many vehicles parked on Meadow Acre Road impeding traffic. The road under the train bridge is single pass only, and presumably too low for a double decker bus to pass. The right of way is frequently ignored, and clearly unable to cope with additional traffic of the scale proposed. The proposed path under the railway line is currently sectioned off and in disrepair. There is a distinct lack of functional playgrounds and local rights of way (walking paths) and no safe route to walk/cycle into Gittisham or enjoy the countryside. Devonshire Road, through Heathpark Industrial Estate is in great disrepair (potholes/fissures), and already unable to cope with peak time traffic e.g. 5pm Mondays, Tuesdays, Wednesdays, and Thursdays. The A30 cannot be accessed from Hayne Lane and so the proposed development will increase the congestion exponentially.

2) Already struggling (and potentially impacted) local services. Honiton Surgery is routinely uncontactable and online based. As an adult you can only get an appointment in a timely manner in extreme situations. How will the surgery service additional residents in their catchment. The suggestion is farcical. Similarly, one can't join NHS Dentists anymore. The waiting list is a matter of decades not years. I also fail to see how Littleton Nursery / Primary School can provide sufficient additional capacity, similarly private nurseries like Sunny Days are struggling to facilitate enough places with the Government's expanded free childcare hours. Honiton Community College has closed its sixth form. There really is not the infrastructure and services present locally to justify this scale of development. Ultimately we do need new homes, but they need to be adequately serviced and an improvement to communities, not a detriment. A proposed shop is suffice.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Local roads, paths, and parks are wholly inadequate. The intersection between Meadow Acre Road and Hayne Lane is already an accident waiting to happen, with vehicles travelling south on Hayne Lane routinely turning left to continue on the road at dangerous speed. Vehicles also routinely enter and exit Meadow Acre Road at too high a speed, positioned centrally in the road (no markings) as if no possibility of encountering oncoming traffic. There are too many vehicles parked on Meadow Acre Road impeding traffic. The road under the train bridge is single pass only, and presumably too low for a double decker bus to pass. The right of way is frequently ignored, and clearly unable to cope with additional traffic of the scale proposed. The proposed path under the railway line is currently sectioned off and in disrepair. There is a distinct lack of functional playgrounds and local rights of way (walking paths) and no safe route to walk/cycle into Gittisham or enjoy the countryside. Devonshire Road, through Heathpark Industrial Estate is in great disrepair (potholes/fissures), and already unable to cope with peak time traffic e.g. 5pm Mondays, Tuesdays, Wednesdays, and Thursdays. The A30 cannot be accessed from Hayne Lane and so the proposed development will increase the congestion exponentially. 2) Already struggling (and potentially impacted) local services. Honiton Surgery is routinely uncontactable and online based. As an adult you can only get an appointment in a timely manner in extreme situations. How will the surgery service additional residents in their catchment. The suggestion is farcical. Similarly, one can't join NHS Dentists anymore. The waiting list is a matter of decades not years. I also fail to see how Littleton Nursery / Primary School can provide sufficient additional capacity, similarly private nurseries like Sunny Days are struggling to facilitate enough places with the Government's expanded free childcare hours. Honiton Community College has closed its sixth form. There really is not the infrastructure and services present locally to justify this scale of development. Ultimately we do need new homes, but they need to be adequately serviced and an improvement to communities, not a detriment. A proposed shop is insuffice.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Local

infrastructure/road safety and services need to be dramatically improved. A two way road and path would be needed added under the railway, a safe walking path provided to Gittisham, and functional parks/playgrounds installed. Local GP and dentist services would need to be vastly improved, and Schools supported.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: 1)

Local roads, paths, and parks are wholly inadequate. The intersection between Meadow Acre Road and Hayne Lane is already an accident waiting to happen, with vehicles travelling south on Hayne Lane routinely turning left to continue on the road at dangerous speed. Vehicles also routinely enter and exit Meadow Acre Road at too high a speed, positioned centrally in the road (no markings) as if no possibility of encountering oncoming traffic. There are too many vehicles parked on Meadow Acre Road impeding traffic. The road under the train bridge is single pass only, and presumably too low for a double decker bus to pass. The right of way is frequently ignored, and clearly unable to cope with additional traffic of the scale proposed. The proposed path under the railway line is currently sectioned off and in disrepair. There is a distinct lack of functional playgrounds and local rights of way (walking paths) and no safe route to walk/cycle into Gittisham or enjoy the countryside. Devonshire Road, through Heathpark Industrial Estate is in great disrepair (potholes/fissures), and already unable to cope with peak time traffic e.g. 5pm Mondays, Tuesdays, Wednesdays, and Thursdays. The A30 cannot be accessed from Hayne Lane and so the proposed development will increase the congestion exponentially. 2) Already struggling (and potentially impacted) local services. Honiton Surgery is routinely uncontactable and online based. As an adult you can only get an appointment in a timely manner in extreme situations. How will the surgery service additional residents in their catchment. The suggestion is farcical. Similarly, one can't join NHS Dentists anymore. The waiting list is a matter of decades not years. I also fail to see how Littleton Nursery / Primary School can provide sufficient additional capacity, similarly private nurseries like Sunny Days are struggling to facilitate enough places with the Government's expanded free childcare hours. Honiton Community College has closed its sixth form. There really is not the infrastructure and services present locally to justify this scale of development. Ultimately we do need new homes, but they need to be adequately serviced and an improvement to communities, not a detriment. A proposed shop is suffice.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Ian Holten

Full name: Ian Holten

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I live at no. 28 Slewton Crescent and strongly object to the proposed development at Whimple_11 for all the reasons cited in the parish council's response, including drainage/flooding issues, unsuitable road access leading to increased traffic through the village and the need to preserve natural habitat.

Margaret Holway

Full name: Margaret Holway

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I write to strongly object about the 2 proposed developments in Whimble: Whiteways Cricket Pitch Bramley Gardens

The village cannot sustain any more housing. There is no parking ,no capacity for schools/GPs/Dentist/Hospitals. The Bramleys Garden area forms part of the green wedge between Whimble and Cranbrook so cannot be usedv as per previous agreeemnts. The roads are chock a block now and there is no parking. The Whiteway Cricket Pitch will mean at least an extra 60 cars .

Whimble needs green spaces not more houses.

Full name: Margaret Holway

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD29

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: With regards to the planning on Whiteways old cricket pitch. To put 33 houses there is creating a major vehicle problem for the village, It will be at least 50 to 60 cars using our village lanes and creating even worse traffic jams than we have now. Also re Bramley gardens...we need some green spaces in Whimple,I believe Cranbrook was developed to keep our villages as villages! Bramley garden side of the village is the green wedge between us and Cranbrook There is not enough parking here now Whimple centre is full to capacity.

Annette Hooker

Full name: Annette Hooker

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: ?

The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA).

Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing

Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the

Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment

area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying

land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic

congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key

services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is

contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

George Hooper

Full name: George Hooper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths (SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and is not on accordance with the mitigation strategy. Exmo_20 would destroy the "tranquility, wildness and dark skies" of the countryside, which is contrary to POLICY OL01. Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9. The Habitats Regulations assessment (30.01.25) confirms that there is "currently not sufficient certainty to rule out adverse effects in integrity in relation to .. air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. Exmo-20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe. This is in conflict with POLICY AR01B. Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The servant infrastructure of Budleigh (High Street, Doctors, school, beach etc) would be the obvious choice for residents of Exmo_2. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local plan - or reduce the size if Exmo_20

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Annette Hooper

Full name: Annette Hooper

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development of Exmo-20 is contrary to policy PB01 of the local plan. Harm to the Pebblebed Heaths is likely because of the scale of the proposed development, and not in accordance with the mitigation strategy. It is contrary to policy OL01 as Exmo-20 would destroy the “tranquility, wildness and dark skies “ of the protected countryside area.

Contrary to paragraphs 13.23 and 13.9 EXmo-20 would destroy wildlife corridors, irreplaceable veteran trees and hedgerows across the site.

EXmO-20 will increase car travel, traffic congestion-conflicting with Paragraph 11.2.Terrain and distance will deter walking and cycling in preference for the car contrary to policy TR01.

Road access to Budleigh Salterton from EXMO-20 will be easier than to Exmouth. Coalescence of Exmouth and Budleigh Salterton is contrary to Policy OL05 of the local plan

Conflict with POLICY AR01B is of great concern increasing flood risks through the lower land at the bottom of the site and down through Withycombe.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reduce the size of EXMO-20 No access to B3179 or Southern Wood

Ian Philip Hornby

Full name: Ian Philip Hornby

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

The use of an online portal discriminates against the elderly in an area where 37% of the population is aged over 60.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

1) The site is within an area of National Landscape, with Beacon Hill local nature reserve, managed by the RSPB, with its Dartford Warblers and Nightjars and much other wildlife less than a mile away. Core Hill deciduous woods are much closer.

2) The junction of Burscombe Lane with the A3052 main road to Exeter is dangerous for large vehicles, and far from ideal for small vehicles limited visibility and tight corners. Burscombe Lane itself has a narrow single lane pinch point between boundary stone walls.

3) I am concerned about water runoff from the site during periods of heavy rain. I live in Corefields and get surface water running into the garden from the field and then forming a small stream down the path at the side of the house and across the front lawn during such periods, which happens several times a year. I dislike the situation as is it is and certainly do not wish the situation to get worse building on the site will reduce its ability to absorb rainfall. I also understand that the local sewage system struggles with existing levels of demand.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.:

2) A redevelopment of the junction? Difficult in the extreme in such a tight space - 3) Substantial drainage works (increasing risk of flooding downstream?)

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

So I can more fully explain the issues with water runoff from the site.

Ewa Howard

Full name: Ewa Howard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making the new residents of Exmo_20 use Budleigh with its services and infrastructure rather than Exmouth as it would be more convenient for them. This would contravene Policy OL05 of the Local Plan as it would lead to merging of Budleigh Salterton and Exmouth. Exmo_20 would also cause harm to the adjacent Pebblebed Heath and to various heritage assets.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Audrey Howell

Full name: Audrey Howell

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The services and infrastructure of Budleigh in particular are not sufficient to accommodate this type of development as residents of the proposed Exmouth 20 would possibly wish to use the Doctors and School. It would totally undermine its individuality. Budleigh already has problems with Surgery appointments for existing residents and parking will become an issue as there will be no bus service near this development. It is all totally contrary to the Policies of the Local plan. OLOS. PB01. HE02. There will e the possibility of flooding

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmouth 20 from the Local Plan

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Chrissy Howick

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: In policy OL01 it is stated that development 'will only be permitted where it would not harm the aesthetic and perceptual factors such as tranquility, wilderness and dark skies' - why then is a 700 home development right on top of a hill and not in either Exmouth or Budleigh - ie in a totally separate, isolated site -adjacent on one side to one of the most treasured and important conservation heathland sites not only in England but in Europe - and on the other side to an ancient 'St Johns in the WILDRENESS' church and surrounds - - even considered?. Surely at the most basic level anyone can see the potential aesthetic, light , sound and traffic pollution that this would cause. It makes one wonder whether the proposers of the site actually have visited it or know where it is let alone considered it in relation to actual policies in the local plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Take out Exmou20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmou_20 is in total contravention of paragraph 2.10 - to protect and enhance our outstanding natural environment and support and increase in biodiversity. On this policy paragraph alone it is unbelievable that this site has been considered for such vast development. Right on the edge of Woodbury Common's pebbled heaths which are internationally designated Sac site - home to many rare species - specifically the Dartford warbler and nightjar and an important SSSI. The light, sound and air pollution from such a development would completely destroy the Heaths and all they stand for. Many local extensions and small building projects have been rejected by planners due to their proximity to the heaths and the detrimental effect they would have (& the presence of cats) and yet this site is closer to the Heaths than any of those sites that have been refused due to proximity to the Heaths. This site is vast and the pollution it would produce is immense. I believe that Exmou20 could be located on alternative sites which would not cause harm to the pebbled heaths and so is in contravention of policy PB01. The Habitat Rgs assessment (policy OLO09 states that permission will not be granted for development which would result in pollution that cannot adequately be mitigated - the sound, light and traffic air pollution of 700 houses with thousands of cars being churned out meters away from the pebbled heaths cannot be mitigated so close to such a sensitive site which relies on quiet, dark and clean air. The habitats regulations assessment PB04 state there is currently not sufficient certainty to run out adverse effects in integrity in relation to & air quality. This site will affect the integrity of a site protected under the Conservation of Habitats and Species regulations 2017 which includes SAC sites. It will also result in the loss of biodiversity and certainly won't encourage biodiversity - para 2.10 in the policy. The area also lies within a Strategic nature Area (SNA 368). Rather than 'enhancing biodiversity and increasing habitat areas

and connecting isolated habitats' as stated in the policy - this development will only serve to further fragment a currently very fragile habitat and reduce existing habitat (and productive agricultural land).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Take out Exmou 20 from local plan

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: TAKE OUT / RECONSIDER EXMOU20

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: REF EXMOU 20 - Para 3.34 - directing growth to tier 1-4 settlements - development should be concentrated in areas with existing infrastructure. The nature of the position of this site means that Exmou20 residents would try and use Budleigh services - these are already overstretched without 700 - 1000 more residents. The local school has recently publicised their desperation at the fact that they are so overrun - more children will not help this situation .

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Take out Exmou20 - it is in a totally unsuitable place for existing services and infrastructure.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please

be as precise as possible.: This will affect Budleigh services and residents - hardly any Budleigh residents or the town council knew of this proposal

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: comments in previous submission

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: take out Exmouth 20

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Conflict with policy HE02 - the site includes a Grade II listed Church - St Johns in the wilderness - surrounding this site with mass development will not be sympathetic to this listed building and its surroundings. Conflict with policy OL05 - this proposal potentially leads to settlement coalescence - site is nearer Budleigh than Exmouth - residents of this site would use Budleigh facilities such as doctor surgeries which would not cope with the amount of people In conflict with paragraph 3.3 - Boundary extended to include land housing will be built on but also 400 m buffer zone by including it in settlement boundary - councillors have suggested that this area can be used for commercial use - - this would cause severe detriment to the pebblebed heaths and surrounds

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will

be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Take out Exmou 20 - it is not viable

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Residents not consulted

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: previously stated in other submissions

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmou 20 is totally in conflict with policy AR01 (B). Area sits on top of a hill on clay soil - draining towards Withycombe Brook area which is already highly populated and in great danger of flood risk. It would be madness to build on a site which would drain so quickly and dangerously into this area and potentially cause mass flooding.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: take out Exmou 20

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: no local or residents opinion sought at any of the stages - policy SD01 PCPA 2004 - section 33A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: to ensure correct regulations are followed

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: not in line with the PCPA 2004 - initial stages deemed it not suitable or achievable and HELAA stage 2. Site was totally omitted from reg 18 consultations due to not being a preferred or 2nd choice site. Site very quickly went to allocated without public opinion or representation being allowed (from anywhere in the local vicinity) - Term Exmou is very misleading as site is nearer Budleigh and should be allowed to be considered for where it is situated,.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Take Exmou20 out of Local plan

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: For reasons stated in 2 B - No public consultation. Maps online appeared to allocate it in red as not a site for consideration - after decisions had been made the map did not change so public were unaware that it was a site for consideration. Once public realised it was being considered many of the avenues for objection were already closed. This process was not in accordance with NPPF chapter 3. It was not preferred or 2nd choice and was not considered in regulation 18 consultations. The speed at which the site was 'allocated' and the lack of time consideration or consultation with relevant bodies such as natural England, the county council on road infrastructure etc was appalling. Local residents, the local community in general were not consulted. Local councillors did not

seem aware of the site. As such local consideration and representation has not been able to be presented at the correct stage of the process

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Take Exmou 20 out of the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Not in accordance with PCPA 2004 - section 33A. No consultation with Devon County Council

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure local residents and other official bodies views are represented

Ian Howick BSc Eng C Eng FICE

Full name: Ian Howick BSc Eng C Eng FICE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: details in previous submission

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: details in previous submission

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmou20 is in conflict with policies SP01, TR01, TR03 and paragraph 11.2, 11.6, 3.34 & 2.6 of the Local plan. Exmou20 is in conflict with policy SD01 - the area considered for development is completely detached from all the town centre services of Exmouth and therefore cannot be considered as a development in Exmouth. Existing development is already developed a long distance from the town centre and any new development will be a long distance from the town and is therefore unsustainable. If people are housed in this area they will be drawn to other villages or more travel by car to get to the facilities they need. Allocation of Exmou20 is in conflict with paragraph 11.6 - most of the site is not within 10 minutes walk of any key services or facilities. To provide those services for this area alone wouldn't be economically viable and will of necessity force people to drive over 2-3 miles over unsuitable roads to access the services they need. Allocation of exmou20 is in conflict with policy TR01. It is fatuous to suggest that people going shopping or to work or the school run will walk or cycle.

Unless a complete re-education of the human race is planned they will not walk more than half a mile without resorting to the use of cars. The provision of walking routes, cycle paths and public transport will be totally uneconomic and unviable and it should be noted that none of the roads including the B3179 has a single foot path on any side of the road on any part of its length and there are no cycleways. Similarly the road from Budleigh Salterton to Littleham has not a single footpath or cycleway on any side of the road from the outskirts of Budleigh Salterton to Littleham. None of the rural roads - St Johns road, Dalditch Lane, Inner Ting Tong and castle lane have any footways at all and are highly dangerous already without any increased traffic flow. Exmouth and Budleigh Salterton schools are already oversubscribed and overcrowded for many of the academic years. without massive investment to provide more schools and recreational facilities it would be irresponsible to condemn future populations of the area to such poor facilities. Will this type of development support the investment needed to provide the educational, recreational , widening and providing footpaths on all essential roads, provision of doctors surgeries, adequate pharmacies, provision of adequate sewerage treatment facilities and sewerage system upgrades to take the flows which are already in excess of their capacity. Development without this investment would be irresponsible in the extreme

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmou 20 from Local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: comments in previous submission

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: comments in previous submission

Full name: Ian Howick BSc Eng C Eng FICE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: comments in previous submission

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: comments in previous submission

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Emou20 is in conflict with PB01 and appears to have been given little or no time in consideration. It is not in accordance with the mitigation strategy and other sites should be reconsidered which will cause less or no harm to the pebbled heaths SAC/SPA. Allocation of Exmou20 is in conflict with policy no SAC/SPA - development involving increased use of the B3179 will create greater air pollution without any mitigation.

Allocation of EXmou20 is in conflict with paragraph 210 objective 8 - it will adversely affect the natural environment and impair biodiversity. It is also in conflict with para 13.23 as it lies within the strategic nature area (SNA368) as part of the local recovery strategy to combine wildlife sites. Allocation of Exmou20 is in conflict with para 13.9 as it would be difficult to restore irreplaceable habitat affected . Irreplaceable mature trees will disappear (and developers have already embarked on felling trees in this area which should be noted by planners) Ancient hedgerows will also be affected and are irreplaceable. The site lies within a Strategic Nature area (SNA368).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmou20 from the local plan - it has been correctly thought out or considered

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: details in previous submission

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: details in previous submission

Full name: Ian Howick BSc Eng C Eng FICE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: submitted in previous response

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: submitted in previous response

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Emou20 is in conflict with PB01 and appears to have been given little or no time in consideration. It is not in accordance with the mitigation strategy and other sites should be reconsidered which will cause less or no harm to the pebbled heaths SAC/SPA. Allocation of Exmou20 is in conflict with policy no SAC/SPA - development involving increased use of the B3179 will create greater air pollution without any mitigation. Allocation of EXmou20 is in conflict with paragraph 210 objective 8 - it will adversely affect the natural environment and impair biodiversity. It is also in conflict with para 13.23 as it lies within the strategic nature area (SNA368) as part of the local recovery strategy to combine wildlife sites. Allocation of Exmou20 is in conflict with para 13.9 as it would be difficult to restore irreplaceable habitat affected . Irreplaceable mature trees will disappear (and developers have already embarked on felling trees in this area which should be noted by planners) Ancient hedgerows will also be affected and are irreplaceable. The site lies within a Strategic Nature area (SNA368).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmou20 from the local plan - it has been correctly thought out or considered

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: comments in previous submission

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: comments in previous submission

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: comments in previous submission

Full name: Chrissy Howick

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: Ref Exmou 20 - These proposals have not been made in accordance with PCPA 2004. Exmou20 was never preferred or considered as a second choice under the HELLA stage two considerations. None of us knew that the site had changed status as it had been dismissed previously. However on 3rd September 2024 the site suddenly became 'allocated' and no further opportunity was given to members of the public or the strategic planning committee to raise any comment or objection. This was despite the assessment not being complete.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: In view of the fact that it has not been correctly assessed or presented to the public Exmou20 should be removed from the local plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmou20 is in conflict with policy AR01(B)- stating that development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere. The allocation of Exmou20 is in conflict with policy AR01(B)- stating that development should be safe for its lifetime without increasing or exacerbating flood risk elsewhere.

The development of 85 hectares of land draining directly to the existing Withycombe Brook will create the potential for very severe flooding of the Withycombe area and the lower areas of Exmouth including the Colonies and Exeter Road. With a steep catchment such as Exmou20 it will be virtually impossible to design retention systems economically on impervious red marl substrata. There were severe floods in 1960 where over 700 houses were damaged with two thirds of Exmouth under water. This was caused by rainfall within the same catchment and the vast area of development which had taken place in Exmouth prior to that date. Consulting engineers to the Council in 1939 recommended that the Withycombe Brook needed serious improvement to avoid serious flooding to the lower parts of Exmouth. However very little was carried out and in 1960 catastrophic flooding occurred. The Consulting Engineers at that time and the Hydraulics Research Station carried out a study and produced a paper showing that the storm that caused the flooding was not of a particularly high return period - only that estimated for once in approximately 2.5 years. Planning advisors should now be well aware that rainfall intensities experienced now over 60 years later are far greater and design recommendations are to allow for rainfall intensities of a once in 100 year storm with upgrades on this for global warming and urban spread. The 1960 population of Exmouth was around 18,500 and development since that time has increased that population to more than double with most of the development draining from the newly developed areas into the Withycombe Brook catchment. Until recently these developments were built without the benefit of mitigation systems (SUDS) and only recently have these started to be employed. Development within this catchment therefore starts with vast areas of development already draining to the Withycombe Brook without any mitigation or restraint in times of heavy rainfall. The improvement works to the Withycombe Brook which were carried out in 1961 - 62 dealt with the situation as it was at that time but it did not allow for a doubling of development draining to it , as has happened and if this development is allowed is most likely to completely inundate the system. In consequence it would be an act of total irresponsibility to add further areas of development to this vulnerable catchment area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Take out Exmou 20 completely from the local plan - it is not viable and it is totally irresponsible to subject the populations of Exmouth living in low lying areas to the potential of serious flooding. Such a scheme will potentially render them homeless and with property impossible to insure

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: We have not been given the opportunity to examine this plan prior to its sudden and mysterious acceptance. My family home and property lies within 400m of the proposed site. I have never been contacted or consulted by proposers of the scheme, any Councillor or the local Authority about it. I find this totally unacceptable.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is important to make authorities understand the potential disastrous consequences of adopting the Exmou20 scheme

Full name: Ian Howick BSc Eng C Eng FICE

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

Full name: Chrissy Howick

Organisation (where relevant): Budleigh Salterton Riding School

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

conflict with Policy TR03 and figure 7 in the local plan. The proposal of 700 properties would add around 1000-1500 cars to the B3179. The quickest cut through to Budleigh Salterton from the B3179 is down Dalditch Lane including busses and lorries too large for the little lane - and it is an often used rat run including DCC minibusses. On numerous occasions in 2024 the B3179 was closed due to accidents and incidents. Traffic was then diverted (or if not diverted chose to go) down Dalditch Lane. This then put both the public and staff of Budleigh Riding School in severe danger. The business relies on moving horses to their fields up and down Dalditch Lane and through Knowle and taking public down Dalditch Lane. The gridlock situation and hundreds of cars going down a lane which is not suitable even for a few cars caused accidents and resulted in injury of both horses and riders. The go ahead for this development would mean that the riding school (which has been running since 1985 and is a huge local employer, local alternative education provider and provider of many work experience placements and school activity provider) may no longer be able to run due to safety concerns. This would mean the loss of much local employment - both directly and indirectly and sadly the inevitable destruction of many horses.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: remove Exmou_20 from local plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: please see previous submissions

Dave Hubbard

Full name: Dave Hubbard

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Wilfrid David Hudson

Full name: Wilfrid David Hudson

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Policies Map

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: The BUAB for Newton Poppleford is incorrectly shown. It seems to have reverted to an earlier version of the BUAB which included much of the west end of the village. This was replaced by a new BUAB which excluded this area of the village and it is that version which should be used before this plan is sent to the planning inspectorate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to be sure that the BUAB for Newton Poppleford has been changed back to that originally agreed

Chris Hughes

Full name: Chris Hughes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is too far out of the built up area and therefore not sustainable. No schools, GPs, shops, or places of work and will not enhance the town of Exmouth.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Alan Hughes

Full name: Alan Hughes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There is no reference I can see (I may have missed it elsewhere in the voluminous pages of the plan) about traffic apart from access. Elm Lane is a narrow close and to use it to access the land to the west the houses would require the demolition of at least one of the dwellings. Additionally the exit from Elm Lane is close to the hairpin bend and bridge that get very busy when Sandy Bay is open. Parlour Meadow already has access to Pankhurst Close and access to a through route at a roundabout with good visibility.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Access to be via Parlour Meadow not Elm Lane

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Mr & Mrs P Hull

Full name: Mr & Mrs P Hull

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

We believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Nigel Humphrey

Full name: Nigel Humphrey

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Policies Map

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: The site maps for Exmo_20 are conflicting with NPPF chapter 3 'Plan Making' where it states that plans should be 'up to date'. The EDDC have been contacted on numerous times to update the map for Exmo_20 to stop promoting the site with land that is not available (i.e. existing homes, listed buildings and the grade II * church and its lands). This was confirmed and the settlement boundaries identified. However, page 326 of the Sustainability Report' shows the Tier One - Principal Centre Settlement Exmouth' map with the 2022 map outline for Exmo_20, as is the map on page 102 of the Site Allocations 'SAL' document for Exmouth (SAL-022). The 2022 maps should not be used in the up to date documentation, it only causes confusion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Ensure that all February 2025 documentation and maps are up to date and reflect the outline for Exmo_20 as per the 'East Devon Local Plan 2020-2042 (Reg 19 Consultation) Inset to Policies map highlighted in blue on this map as is the map on page 103 of the Site Allocations (SAL) for Exmouth. Remove the map on page 102 of the Site Allocations (SAL) for Exmouth. Please note these are the only ones I have found there may be other discrepancies.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

5.1

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. At the Strategic Planning Committee (SPC) meeting on the 1st November 2022 a total of 17 sites had NEW 'a' and 'b' site references added for inclusion in the Reg 18 Consultation process. None of these NEW sites were discussed/approved at this meeting, they were only introduced as part of the report pack for this meeting within the site maps, and no reason was provided for the introduction of these new sites (I have attached details of these sites as evidence below). There was a resolution passed at this meeting on the 1st November 2022 as follows 'Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content;'. I have received written confirmation from the current Chair of the SPC stating that 'Neither Mr Freeman nor Mr Dickins nor myself have any authority to unilaterally remove (or, indeed, add) sites from the plan', (see attached evidence for this submission). The inclusion of 34 NEW sites cannot be seen as 'minor'!!! None of these 'a' and 'b' sites are mentioned in the HELAA, Sustainability Appraisal Report or in the 'Sites Additional Information' documents. These reports and documents form the KEY evidence to support the Draft Local Plan for the Reg 18 consultation. The breakdown of the original site references into two parts completely changes the descriptions for each individual part of the site, and should have been discussed in detail and correctly assessed and agreed by the SPC. A change of this magnitude should have been identified somewhere, but there is no evidence in the meeting notes or YouTube videos that this ever took place.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

5.1

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process has not been in accordance with NPPF Chapter 3. At the Strategic Planning Committee (SPC) meeting on the 1st November 2022 a total of 17 sites had NEW 'a' and 'b' site references added for inclusion in the Reg 18 Consultation process. None of these NEW sites were discussed/approved at this meeting, they were only introduced as part of the report pack for this meeting within the site maps, and no reason was provided for the introduction of these new sites (I have attached details of these sites as evidence below). There was a resolution passed at this meeting on the 1st November 2022 as follows 'Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content;'. I have received written confirmation from the current Chair of the SPC stating that 'Neither Mr Freeman nor Mr Dickins nor myself have any authority to unilaterally remove (or, indeed, add) sites from the plan', (see attached evidence for this submission). The inclusion of 34 NEW sites cannot be seen as 'minor'!!! None of these 'a' and 'b' sites are mentioned in the HELAA, Sustainability Appraisal Report or in the 'Sites Additional Information' documents. These reports and documents form the KEY evidence to support the Draft Local Plan for the Reg 18 consultation. The breakdown of the original site references into two parts completely changes the descriptions for each individual part of the site, and should have been discussed in detail and correctly assessed and agreed by the SPC. A change of this magnitude should have been identified somewhere, but there is no evidence in the meeting notes or YouTube videos that this ever took place.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I am sorry but I do not know how to make the identified parts of this chapter sound.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with Paragraph 11.6. Paragraph 11.6 states 'Studies suggest that most people prefer to walk if their destination is within 1.6 km (1 mile), typically 800m (0.5 miles). Factors such as topography, surveillance, directness, and attractiveness also influence walking choices. While it is unrealistic to require all new developments in rural East Devon to be within 800m of key services and facilities, this is feasible in larger settlements and developments.'

This is ambiguous, not justified and not consistent with National Policy.

The paragraph should omit 'prefer', as 1.6km, is stated as a limiting value and for total 'there & back distance' in referenced documents.

The policy should reflect the wording of the referenced documents and give consideration to the Sustran - Walkable Neighbourhoods publication (attached).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reword Paragraph

11.6 to ensure housing allocations are assessed using the 800m distance to services and facilities.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that the 800m (1.6km 'there & back') figure is used to determine site allocations.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 is in conflict with Paragraph 11.6 which states ‘Studies suggest that most people prefer to walk if their destination is within 1.6 km (1 mile), typically 800m (0.5 miles). Factors such as topography, surveillance, directness, and attractiveness also influence walking choices. While it is unrealistic to require all new developments in rural East Devon to be within 800m of key services and facilities, this is feasible in larger settlements and developments.’ The referenced documents do not state people ‘prefer’ to walk if their destination is within 1.6 km, the documents refer predominantly to 800m being deemed walkable and that the trip (there and back) distance is 1.6km. The referenced CIHT planning for walking states ‘Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes’ walking distance (around 800 metres).’ This is further supported by the ‘Sustran, Walkable Neighbourhoods’ publication (attached). Much of the Exmo_20 site is beyond 800m from existing services and facilities. Attached is a map demonstrating this by showing 800m radiuses from existing primary schools, taking no account for actual non ‘as the crow flies’ distances and the significant local topography. Therefore, unless significant services and facilities are part of the Exmo_20 masterplan and delivered, much of Exmo_20 is in an unsustainable location therefore unjustified and not consistent with National Policy, so not sound. This is even more significant for Exmo_20, as if the future residents rely on car use for accessing services and facilities, the main access point is via the country road, requiring driving over 2 miles to get back the outskirts of Exmouth, further compounding its unsustainability. It is appropriate that this site was deemed ‘not suitable and not achievable’ in HELAA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Other sites, which did pass HELAA and were 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.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that the 800m (1.6km 'there & back') figure is used to determine site allocations for larger settlements and developments.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocation of Exmo_20 would be in conflict with Paragraph 11.6 which states 'Studies suggest that most people prefer to walk if their destination is within 1.6 km (1 mile), typically 800m (0.5 miles). Factors such as topography, surveillance, directness, and attractiveness also influence walking choices. While it is unrealistic to require all new developments in rural East Devon to be within 800m of key services and facilities, this is feasible in larger settlements and developments.' The referenced documents do not state people 'prefer' to walk if their destination is within 1.6 km, the documents refer predominantly to 800m being deemed walkable and that the trip (there and back) distance is 1.6km. The referenced CIHT planning for walking states 'Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800 metres).' This is further supported by the 'Sustran, Walkable Neighbourhoods' publication (attached). Much of the Exmo_20 site is beyond 800m from existing services and facilities. Attached is a map demonstrating this by showing 800m radiuses from existing primary schools, taking no account for actual non 'as the crow flies' distances and the significant local topography. Therefore, unless significant services and facilities are part of the Exmo_20 masterplan and delivered, much of Exmo_20 is in an unsustainable location. This is even more significant for Exmo_20, as if the future residents rely on car use for accessing services and facilities, the main access point is via the country road, requiring driving over 2 miles to get back the outskirts of Exmouth, further compounding its unsustainability. It is appropriate that this site was deemed 'not suitable and not achievable'.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Other sites, which did pass HELAA and were 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.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that the 800m (1.6km 'there & back') figure is used to determine site allocations for larger settlements and developments.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The site maps for Exmo_20 are conflicting with NPPF chapter 3 'Plan Making' where it states that plans should be 'up to date'. The EDDC have been contacted on numerous times to update the map for Exmo_20 and to stop promoting the site with land that is not available (i.e. existing homes, listed buildings and the grade II * church and its lands). This was confirmed and the settlement boundaries identified at the end of 2024. However, page 326 of the 'Sustainability Appraisal Report' shows the 'Tier One - Principal Centre Settlement Exmouth' map with the 2022 map outline for Exmo_20, as is the map on page 96 of the 'Site Allocations (SAL) for Exmouth' (SAL-022). The 2022 maps should not be used in the up to date documentation, it only causes confusion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Ensure that all February 2025 documentation and maps are up to date and reflect the outline for Exmo_20 as per the 'East Devon Local Plan 2020-2042 (Reg 19 Consultation) inset to Policies map' highlighted in blue on this map, as is the map on page 97 of the 'Site Allocations (SAL) for Exmouth'. Remove the map on page 96 of the 'Site Allocations (SAL) for Exmouth'. Use the correct map on page 326 of the 'Sustainability Appraisal Report'. Please note these are the only ones I have found, there may be other discrepancies.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Site reference Exmo_20 as a 'complete' site has NEVER been consulted on as a whole site, and sites Exmo_20a and Exmo_20b should NEVER have been created (see main evidence attached). In addition to the attached evidence the following is to be noted.

The document 'TR1-023 East Devon Local Plan Initial Site Assessments - Transport', (which is available within the evidence library, but I have attached for ease) details information for sites Exmo_20a and Exmo_20b, NOT Exmo_20. The site Exmo_20 as a 'whole' is a totally different consideration, and this again proves that it has NOT been consulted on as a 'whole site'. There is also one thing to note, the vehicular access restrictions (modest development, and majority development phrases) highlighted in the draft Local Plan for Exmo_20, means that the site will 'at best', be SPLIT due to Southern Wood access issues, or 'worst', ALL access for the site will be via the B3179.

Regardless of the above, the details given for the Exmo_20a and Exmo_20b sites are also incorrect and need to be corrected as follows.

Exmo_20a 'Local centre proximity', the main access is via the B3179, so the town centre is over 6km away via this route and from the middle of the site there are no facilities within 800m (so should be RED). The 'bus provision', why would a bus provider come into the site and back out via the same access route just for this site? Highly unlikely (so should be RED). The 'rail provision', via the B3179 the train station is over 6km away (so should be RED). The 'active travel (notes existing)', it states that the 'Main road has

pavements currently but lack of crossing points and is very busy.', this is a copy of what they have for Exmo_20b, however, the 'main road' for Exmo_20a is the B3179 which has NO pavements, and NO crossing points, and is VERY busy (so should be RED). The 'active travel (notes potential)', states that 'Active Travel links included within this proposal. Externall this site will benefit from the Dinan Way improvements', the main access point for this site is the B3179, this site will NOT benefit from the Dinan Way Improvement (so should be RED). based on the above Exmo_20a should be RED overall. It is alarming that this evidence has been allowed to be submitted. A member of the public should not be identifying these basic errors.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand why Exmo_20 is still seen as viable and or sustainable, taking into account all of the issues with this site. Not to mention the fact that it should never have been considered even at Reg 18 stage.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 as a 'complete' site has NEVER been consulted on as a whole site, and sites Exmo_20a and Exmo_20b should NEVER have been created (see main evidence attached). In addition to the attached evidence the following is to be noted.

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pavements currently but lack of crossing points and is very busy.', this is a copy of what they have for Exmo_20b, however, the 'main road' for Exmo_20a is the B3179 which has NO pavements, and NO crossing points, and is VERY busy (so should be RED). The 'active travel (notes potential)', states that 'Active Travel links included within this proposal. Externall this site will benefit from the Dinan Way improvements', the main access point for this site is the B3179, this site will NOT benefit from the Dinan Way Improvement (so should be RED). based on the above Exmo_20a should be RED overall. It is alarming that this evidence has been allowed to be submitted. A member of the public should not be identifying these basic errors.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Amend the incorrect data as identified. Remove Exmo_20 from the Draft Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand why Exmo_20 is still seen as viable and or sustainable, taking into account all of the issues with this site. Not to mention the fact that it should never have been considered even at Reg 18 stage.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. Site reference Exmo_20 as a 'complete' site has NEVER been consulted on as a whole site, and sites Exmo_20a and Exmo_20b should NEVER have been created (see main evidence attached). In addition to the attached evidence the following is to be noted.

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Regardless of the above, the details given for the Exmo_20a and Exmo_20b sites are also incorrect and need to be corrected as follows.

Exmo_20a 'Local centre proximity', the main access is via the B3179, so the town centre is over 6km away via this route and from the middle of the site there are no facilities within 800m (so should be RED). The 'bus provision', why would a bus provider come into the site and back out via the same access route just for this site? Highly unlikely (so should be RED). The 'rail provision', via the B3179 the train station is over 6km away (so should be RED). The 'active travel (notes existing)', it states that the 'Main road has pavements currently but lack of crossing points and is very busy.', this is a copy of what

they have for Exmo_20b, however, the 'main road' for Exmo_20a is the B3179 which has NO pavements, and NO crossing points, and is VERY busy (so should be RED). The 'active travel (notes potential)', states that 'Active Travel links included within this proposal. Externall this site will benefit from the Dinan Way improvements', the main access point for this site is the B3179, this site will NOT benefit from the Dinan Way Improvement (so should be RED). based on the above Exmo_20a should be RED overall. It is alarming that this evidence has been allowed to be submitted. A member of the public should not be identifying these basic errors.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Amend the incorrect data as identified. Remove Exmo_20 from the Draft Local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To ensure that all of the evidence that I have amassed is taken into account and to finally get some answers with regards to why site reference Exmo_20 is still seen as viable and or sustainable. This site has NEVER had a fair hearing and it is about time this was recognised. Not to mention the fact that it should never have been considered even at Reg 18 stage.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. There has been quite a large amount of sites put forward in the Reg 18 consultation phase that should not have been included due to the fact that they failed Stage 2 'site sifting'. These sites are all classed as 'rejected' and even state within their 'very brief' descriptions that they have indeed failed 'site sifting'. I have been informed by the EDDC Planning Policy Team that any site that passed Stage 2 site sifting would go through to the Reg 18 consultation phase. However, these sites DID NOT pass Stage 2 site sifting, so should NOT have gone through to the Reg 18 consultation phase. This raises concerns around the utilisation/adherence by EDDC to their own processes and procedures. Specifically in relation to the 'Site Selection Methodology' (dated May 2022) and the HELAA Report (dated November 2022). Please see the attached evidence to support the above. In addition to the above, It is also worrying that EDDC have agreed to the inclusion of 'rejected' sites within the Reg 18 submissions, seemingly with the view that if the site receives a comment, then they can class it as consulted on, and can therefore bring it forward for allocation at a later stage (as they have done with site Exmo_20a). If EDDC thought that documents or reports were 'not fit for purpose' then they should have amended them then and there, and not put them forward as evidence. It is also to be noted that within the Reg 19 documents, sites that have 'not been allocated' are also still included in the maps (highlighted in red). Does this mean that they could be brought back in at the planning stage because they can be classed as having been through the consultation phase? This is again rather worrying, why have them included?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand why Exmo_20 is still seen as viable and or sustainable, taking into account all of the issues with this site Not to mention the fact that it should never have been considered even at Reg 18 stage.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. There has been quite a large amount of sites put forward in the Reg 18 consultation phase that should not have been included due to the fact that they failed Stage 2 'site sifting'. These sites are all classed as 'rejected' and even state within their 'very brief' descriptions that they have indeed failed 'site sifting'. I have been informed by the EDDC Planning Policy Team that any site that passed Stage 2 site sifting would go through to the Reg 18 consultation phase. However, these sites DID NOT pass Stage 2 site sifting, so should NOT have gone through to the Reg 18 consultation phase. This raises concerns around the utilisation/adherence by EDDC to their own processes and procedures. Specifically in relation to the 'Site Selection Methodology' (dated May 2022) and the HELAA Report (dated November 2022). Please see the attached evidence to support the above. In addition to the above, It is also worrying that EDDC have agreed to the inclusion of 'rejected' sites within the Reg 18 submissions, seemingly with the view that if the site receives a comment, then they can class it as consulted on, and can therefore bring it forward for allocation at a later stage (as they have done with site Exmo_20a). If EDDC thought that documents or reports were 'not fit for purpose' then they should have amended them then and there, and not put them forward as evidence. It is also to be noted that within the Reg 19 documents, sites that have 'not been allocated' are also still included in the maps (highlighted in red). Does this mean that they could be brought back in at the planning stage because they can be classed as having been through the consultation phase? This is again rather worrying, why have them included?

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if

you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: EDDC need to seriously look at their policies and procedures and see if they are ‘fit for purpose’ before claiming to have applied/adhered to them. In this case out of the 50 plus sites identified, only 8 seem to have made it to Reg 19. Therefore, these sites should be removed from the plan, and are Exmo_20 (as Exmo_20a and Exmo_20b are on the list), Exmo_08, Exmo_47, Axmi_10, Brcl_29, GH/ED/39a and GH/ED/39b.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand why based on all the evidence against allocating Exmo_20, that EDDC are still going ahead.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. There has been quite a large amount of sites put forward in the Reg 18 consultation phase that should not have been included due to the fact that they failed Stage 2 'site sifting'. These sites are all classed as 'rejected' and even state within their 'very brief' descriptions that they have indeed failed 'site sifting'. I have been informed by the EDDC Planning Policy Team that any site that passed Stage 2 site sifting would go through to the Reg 18 consultation phase. However, these sites DID NOT pass Stage 2 site sifting, so should NOT have gone through to the Reg 18 consultation phase. This raises concerns around the utilisation/adherence by EDDC to their own processes and procedures. Specifically in relation to the 'Site Selection Methodology' (dated May 2022) and the HELAA Report (dated November 2022). Please see the attached evidence to support the above.

In addition to the above, It is also worrying that EDDC have agreed to the inclusion of 'rejected' sites within the Reg 18 submissions, seemingly with the view that if the site receives a comment, then they can class it as consulted on, and can therefore bring it forward for allocation at a later stage (as they have done with site Exmo_20a).

If EDDC thought that documents or reports were 'not fit for purpose' then they should have amended them then and there, and not put them forward as evidence.

It is also to be noted that within the Reg 19 documents, sites that have 'not been allocated' are also still included in the maps (highlighted in red). Does this mean that they could be brought back in at the planning stage because they can be classed as

having been through the consultation phase? This is again rather worrying, why have them included?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: EDDC need to seriously look at their policies and procedures and see if they are ‘fit for purpose’ before claiming to have applied/adhered to them. In this case out of the 50 plus sites identified, only 8 seem to have made it to Reg 19. Therefore, these sites should be removed from the plan, and are Exmo_20 (as Exmo_20a and Exmo_20b are on the list), Exmo_08, Exmo_47, Axmi_10, Brcl_29, GH/ED/39a and GH/ED/39b.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To understand why Exmo_20 is being promoted without any valid reasons.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. 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.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I want to hear why Exmo_20 has got to this stage. As based on the EDDC's own documents and processes this site should NEVER have even got to Reg 18 consultation.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. 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.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of

any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The Reg 18 and Reg 19 processes/procedures seem to have been ignored in respect to site Exmo_20.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. 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.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any

matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The EDDC processes/procedures seem to have been totally ignored in relation to site Exmo_20 and Exmo_46.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are inconsistencies within the policies SP04, SD01 and SD02. Site Axmi_11c is described within SD02, yet site Axmi_11a is mentioned within the Spatial Strategy SP04 on page 39. Where did Axmi_11c come from as this was not in Reg 18? Site reference GH/ED/80a is described within SD02, yet site GH/ED/80 is mentioned within the Spatial Strategy SP04 on page 39, and is also mentioned within the description for site reference Axmi_22 in SD02. Site reference Exmo_20 is described within SD01, yet site reference Exmo_20b is mentioned within the Spatial Strategy SP04 on page 39.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Resolve the inconsistencies identified.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are inconsistencies within the policies SP04, SD01 and SD02. Site Axmi_11c is described within SD02, yet site Axmi_11a is mentioned within the Spatial Strategy SP04 on page 39. Where did Axmi_11c come from as this was not in Reg 18? Site reference GH/ED/80a is described within SD02, yet site GH/ED/80 is mentioned within the Spatial Strategy SP04 on page 39, and is also mentioned within the description for site reference Axmi_22 in SD02. Site reference Exmo_20 is described within SD01, yet site reference Exmo_20b is mentioned within the Spatial Strategy SP04 on page 39.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Resolve the inconsistencies identified.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. At the Strategic Planning Committee (SPC) meeting on the 1st November 2022 a total of 17 sites had NEW 'a' and 'b' site references added for inclusion in the Reg 18 Consultation process. None of these NEW sites were discussed/approved at this meeting, they were only introduced as part of the report pack for this meeting within the site maps, and no reason was provided for the introduction of these new sites (I have attached details of these sites as evidence below). There was a resolution passed at this meeting on the 1st November 2022 as follows 'Delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Chair of Strategic Planning Committee, to finalise the plan for consultation. To include making minor changes to correct possible factual or grammatical errors, ensure links to background reports are made and other minor amendments that do not materially change content;'. I have received written confirmation from the current Chair of the SPC stating that 'Neither Mr Freeman nor Mr Dickins nor myself have any authority to unilaterally remove (or, indeed, add) sites from the plan', (see attached evidence for this submission). The inclusion of 34 NEW sites cannot be seen as 'minor'!!! None of these 'a' and 'b' sites are mentioned in the HELAA, Sustainability Appraisal Report or in the 'Sites Additional Information' documents. These reports and documents form the KEY evidence to support the Draft Local Plan for the Reg 18 consultation. The breakdown of the original site references into two parts completely changes the descriptions for each individual part of the site, and should have been discussed in detail and correctly assessed and agreed by the SPC. A change of this magnitude should have been identified somewhere, but there is no evidence in the meeting notes or YouTube videos that this ever took place.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of

any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I do not know where to start.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policies SP01, TR03, OL09 and OL05, along with paragraphs 11.2 and 3.34. The description in the Draft Local Plan for Exmo_20 in relation to the vehicular access is ambiguous and open to interpretation. It states that 'Vehicular access to accommodate modest levels of development, will be allowed for southern site parts from the road Southern Wood.... Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the North'. So 'modest' can be anything from 0% to 49% of development (0 to 343 homes), and 'bulk' can be anything from 51% to 100% of development (357 to 700 homes). I have asked for clarity with regards to the vehicular access for Exmo_20 on numerous occasions without any further clarification forthcoming (see attached evidence for an example of this). Due to this uncertainty I have been pushed to raise numerous submissions to cover all possibilities. This submission relates to the 49% and 51% option. This means that the site will effectively be split into two, as access to the North and South of the sites will have to be restricted to stop residents utilising both access points. This highlights new 'major' concerns for the Southern Wood access point, as this means that a development the same size as currently accessing Dinan Way from Meadowview Road, will be coming through Southern Wood (currently a cul-de-sac), onto Meadowview Road then onto Dinan Way. So, 'doubling' the amount of traffic currently using these routes which are already congested. This will still result in the majority of residents having to travel over half a mile just to get out of the site, then another 4.3 miles to get to Exmouth town centre, or 2.2 miles to Budleigh Salterton town centre.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop site Exmo_20 now.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policies SP01, TR03, OL09 and OL05, along with paragraphs 11.2 and 3.34. The description in the Draft Local Plan for Exmo_20 in relation to the vehicular access is ambiguous and open to interpretation. It states that 'Vehicular access to accommodate modest levels of development, will be allowed for southern site parts from the road Southern Wood.... Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the North'. So 'modest' can be anything from 0% to 49% of development (0 to 343 homes), and 'bulk' can be anything from 51% to 100% of development (357 to 700 homes). I have asked for clarity with regards to the vehicular access for Exmo_20 on numerous occasions without any further clarification forthcoming (see attached evidence for an example of this). Due to this uncertainty I have been pushed to raise numerous submissions to cover all possibilities. This submission relates to the 0% and 100% option. This means that ALL vehicular access will be from the North of the site via the B3179. This will result in ALL of the residents having to travel over half a mile just to get out of the site, then another 4.3 miles to get to Exmouth town centre , or 2.2 miles to Budleigh Salterton town centre.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022. Using the 'Site Selection Methodology' document that was in effect at the time (dated May 2022, confirmed by email from the EDDC Planning Policy Team dated 12/03/2025), Exmo_20 failed Stage 2 'site sifting', as the criteria states that sites MUST be 'available, achievable and suitable' to meeting the criteria for going forward to consultation. The fact that sites have to pass Stage 2 'site sifting' to go through to consultation is confirmed in an email from the Planning Policy team dated 03/03/2025. Based on all of the above, Exmo_20 should not have been put forward for Reg 18 consultation (and Exmo_20a and Exmo_20b should never have existed). Email evidence can be found attached to this submission, and the HELAA and Site Selection Methodology document (dated May 2022) can be found on the EDDC website.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: EDDC have failed to comply with their duty to co-operate in relation to sites Exmo_20, Exmo_20a, Exmo_20b and Exmo_46.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022. Using the 'Site Selection Methodology' document that was in effect at the time (dated May 2022, confirmed by email from the EDDC Planning Policy Team dated 12/03/2025), Exmo_20 failed Stage 2 'site sifting', as the criteria states that sites MUST be 'available, achievable and suitable' to meeting the criteria for going forward to consultation. The fact that sites have to pass Stage 2 'site sifting' to go through to consultation is confirmed in an email from the Planning Policy team dated 03/03/2025. Based on all of the above, Exmo_20 should not have been put forward for Reg 18 consultation (and Exmo_20a and Exmo_20b should never have existed). Email evidence can be found attached to this submission, and the HELAA and Site Selection Methodology document (dated May 2022) can be found on the EDDC website.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Site Exmo_20 should never have made it to Reg 18 consultation never mind Reg 19 if EDDC's own procedures and processes had been followed.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. Site reference Exmo_20 was deemed 'available BUT NOT achievable or suitable' in the HELAA report back in November 2022. Using the 'Site Selection Methodology' document that was in effect at the time (dated May 2022, confirmed by email from the EDDC Planning Policy Team dated 12/03/2025), Exmo_20 failed Stage 2 'site sifting', as the criteria states that sites MUST be 'available, achievable and suitable' to meeting the criteria for going forward to consultation. The fact that sites have to pass Stage 2 'site sifting' to go through to consultation is confirmed in an email from the Planning Policy team dated 03/03/2025. Based on all of the above, Exmo_20 should not have been put forward for Reg 18 consultation (and Exmo_20a and Exmo_20b should never have existed). Email evidence can be found attached to this submission, and the HELAA and Site Selection Methodology document (dated May 2022) can be found on the EDDC website.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I do not believe that the decisions made in relation to

site Exmo_20 have been following EDDC's own methodologies and processes/procedures.

Martin Thomas Humphrey

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 as a 'complete' site was NOT put forward for the Regulation 18 consultations. However, this site was suddenly reinstated at the Strategic Planning Committee meeting on the 3rd September 2024, due to the two sites Exmo_20a and Exmo_20b being put forward as allocated. As above, Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022. In addition to this, despite numerous requests by concerned residents, there has been no further consideration or representation permitted since the this site was recreated on the 3rd September 2024.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed 'not suitable or achievable' within the HELAA Report November 2022, and was therefore NOT put forward for the Regulation 18 consultations. Which means that the public and relevant stakeholders including Statutory Bodies (e.g. Natural England, Devon County Council, etc.) have not had a chance to consult on site Exmo_20.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 as a 'complete' site was NOT put forward for the Regulation 18 consultations. However, this site was suddenly reinstated at the Strategic Planning Committee meeting on the 3rd September 2024, due to the two sites Exmo_20a and Exmo_20b being put forward as allocated. As above, Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022. In addition to this, despite numerous requests by concerned residents, there has been no further consideration or representation permitted since the this site was recreated on the 3rd September 2024.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with policy AR01(B). The proposed site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The land is regularly waterlogged due to the soil type and is not suitable for a development of this size. The land is already an identified flood risk through the lower lying land at the bottom of the site and down through Withycombe, and the proposed development on this steep sloping site can only increase this risk.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This area is not suitable for development, remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 3.30. This plan fails to robustly protect the SSSI Pebblebed Heaths. The settlement boundary around this site includes the 400m buffer zone adjoining the Pebblebed Heaths, effectively defining this land as acceptable for development. Although housing cannot be built within this buffer zone, by including it within the settlement boundary gives the impression that it may be available for other kinds of development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We need to protect our countryside. Stop Exmo_20 now.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL05. The main access point for this site is via the B3179. Which means that residents will have to travel between 4.2 and 4.3 miles to get to the centre of Exmouth, whereas the centre of Budleigh Salterton is only 2.2 miles. This makes Budleigh Salterton significantly more accessible to the residents of this development for key facilities/services. Currently Exmouth and Budleigh are separated in terms of functionality but this development would effectively merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other. This is also a large site, so is Budleigh ready for this sudden increased demand?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site is not viable. Take Exmo_20 out of the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy HE02 - Development at this site will encircle the Grade II* listed St. John in the Wilderness Church and will have significant adverse effects on the remoteness and tranquillity that is so unique to this church and its surroundings. This development will result in the loss of a unique peaceful and tranquil setting, not only for the congregation, but also the numerous visitors that come to pay their respect's to their relatives in the churchyard, and also those that visit the area to see the church and its settings.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL01. The site is noted for its dark skies, tranquillity and wildness. The proposed site will encircle the Grade II* listed St John is the Wilderness Church and churchyard, which will result in its tranquillity, remoteness and dark skies being lost forever, regardless of any buffer zone being provided. Along with the new light from the proposed housing development itself, and with the main access for the site being onto the B3179, which is directly opposite the SPA/SAC/SSSI, this would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Pebblebed Heaths as vehicles exit the site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This development will ruin this area. Remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines ‘irreplaceable habitat’ as “habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed”. Development of this site will result in the loss of irreplaceable habitats. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. This site has a vast amount of mature trees, which provide unique micro habitats and any loss cannot simply be mitigated by planting new trees. This site also contains many long-established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and even if the developers promise that space can be left around them, the loss and reduction of habitat is unavoidable. The variety of wildlife that live and frequent in these fields, trees and hedgerows, will undoubtedly be affected by this development. The whole of this site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the SSSI Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be lost forever by the development of this site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 13.23. The whole of this site lies within an identified 'Strategic Nature Area'(SNA 368) on the Nature Recovery Network. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of this SPA. This site provides a means of connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of this site. The amount and variety of wildlife that utilises this land and the nearby SSSI Pebblebed Heaths is amazing, and will be lost if this site is developed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with paragraph 2.10, objective 8. This will result in the loss of a considerable amount of land that provides an abundance of biodiversity, both on site and on the adjacent SAC/SPA/SSSI. This will adversely affect the natural environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop destroying our countryside, remove Exmo_20 from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (dated 30.01.25) highlights that there is “currently not sufficient certainty to rule out advert effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).” With the majority of the traffic from this site going via the B3179 which runs along the edge of the SSSI Pebblebed Heaths (SAC/SPA), the emissions/pollution created will undoubtedly have a ‘negative’ impact on the air quality in this area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not destroy out environment, remove this site from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL09. The The Habitats Regulations Assessment (dated 30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. The main access point for this site is via the B3179 which runs along the edge of the SSSI Pebblebed Heaths. This will lead to an increase in emissions due to the increase in traffic, which will also have a huge ‘negative’ impact on the air quality here.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site is not viable, stop it now.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 2.6; This site is classed as 'Rural East Devon' due to its position outside of Exmouth. This development will destroy not only the open countryside within it, but will also destroy the setting of a grade II * listed Church and churchyard which is currently in the middle of it. This is the largest development on Exmouth and if approved will destroy yet another part of Rural East Devon.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove this site from the plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. No new sustainable travel arrangements have been proposed for this site that are viable. The site will not promote walking/cycling due to the fact that it slopes steeply from North to South. The main access point onto the B3179 for this development will generate major amounts of vehicle movements just to access services within Exmouth and the neighbouring villages. This will also lead to an increase in travel to and from the main towns/cities, and access to the main route out of the area via the M5.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site is not viable, stop it now.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 3.34: This site will not add any crucial infrastructure such as a secondary school, doctors surgery, or dentists surgery. It will only add to an already creaking infrastructure. In addition to this, it will also increase the pressure on our sewage system, which already has major issues and is regularly closing down our beaches and areas on the Maer. This has been highlighted several times on national news and via the press. How long before Exmouth becomes a place to avoid?

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from this plan.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 11.2. The Draft Local Plan states that the access point for the majority of this site (if not all) be at the North of the site via the B3179. This access point is approximately 4.3 miles from the centre of Exmouth and onto an already congested road that also is the main route in and out of Budleigh Salterton. This is a busy route on a daily basis, and gets even worse in the holiday seasons. This will result in increased car travel requirements for the majority (if not all) of the site. This proposed site is the largest in Exmouth, and its location does not promote less travel, nor will it do anything to reduce traffic congestion in and out of Exmouth. This site cannot be classed as sustainable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site is not sustainable, remove it from the local plan now.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy TR01. This site slopes steeply from North to South, walking and/or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc. as the distances are too far. The provision of walking routes, cycle paths or public transport will not alleviate the amount of car journeys this development would generate, especially taking into account the fact that the site topography, and the distance people will have to travel to access essential services/facilities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal of site Exmo_20 is in conflict with paragraph 11.6. This site slopes steeply downhill from the North to the South. Regardless of what the developer says, this will not promote walking and cycling. Key services and facilities for the bulk of this site are not within the stated 800m (approx 10 mins walk). The likelihood is that residents will need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring towns/villages. Who walks to do their main shopping, visit the doctors, dentists, etc? This site is too isolated to be sustainable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This site is not viable, stop it not.

Full name: Martin Thomas Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy SP01. This site cannot be seen as promoting the most significant levels of development as the principal centre of Exmouth. This is the largest proposed development for Exmouth, yet the main access point for this site is via the B3179, which makes Budleigh Salterton town centre (at 2.2 miles away) over 2 miles closer than Exmouth Town centre. This site cannot be considered to be a development in Exmouth and is an unsustainable location.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not allocate this site as it is not viable

Alison Jane Humphrey

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed 'not suitable or achievable' within the HELAA Report November 2022, and was therefore NOT put forward for the Regulation 18 consultations. Which means that the public and relevant stakeholders including Statutory Bodies (e.g. Natural England, Devon County Council, etc.) have not had a chance to consult on site Exmo_20.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Site reference Exmo_20 as a 'complete' site was NOT put forward for the Regulation 18 consultations. However, this site was suddenly reinstated at the Strategic Planning Committee meeting on the 3rd September 2024, due to the two sites Exmo_20a and Exmo_20b being put forward as allocated. As above, Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022. In addition to this, despite numerous requests by concerned residents, there has been no further consideration or representation permitted since the this site was recreated on the 3rd September 2024.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPFChapter 3. Site reference Exmo_20 as a 'complete' site was NOT put forward for the Regulation 18 consultations. However, this site was suddenly reinstated at the Strategic Planning Committee meeting on the 3rd September 2024, due to the two sites Exmo_20a and Exmo_20b being put forward as allocated. As above, Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022. In addition to this, despite numerous requests by concerned residents, there has been no further consideration or representation permitted since the this site was recreated on the 3rd September 2024.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop Exmo_20 now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Submit this under Chapter 5 - policy SD01. Select 'No' to being sound. Proposed site Exmo_20 is in conflict with policy AR01(B). The proposed site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The land is regularly waterlogged due to the soil type and is not suitable for a development of this size. The land is already an identified flood risk through the lower lying land at the bottom of the site and down through Withycombe, and the proposed development on this steep sloping site can only increase this risk.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Submit this under Chapter 5 - policy SD01. Select 'No' to being sound. Site Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around this site includes the 400m buffer zone adjoining the Pebblebed Heaths, effectively defining this land as acceptable for development. Although housing cannot be built within this buffer zone, by including it within the settlement boundary gives the impression that it may be available for other kinds of development. Which effectively means that the plan fails to robustly protect the SSSI Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop this site now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Submit this under Chapter 5 - Policy SD01. Select 'No' to being sound. Site Exmo_20 is in conflict with policy OL05. The local plan states that the majority of the development will utilise the main access point for this site (via the B3179). This means that residents will have to travel between 4 and 4.3 miles to get to the centre of Exmouth, whereas the centre of Budleigh Salterton is only 2.2 miles, which makes Budleigh Salterton significantly more accessible to the residents of this development. The High Street, Doctor's surgery, Dentists, schools, beach etc in Budleigh would be the most accessible and obvious choices for residents of this site. Currently Exmouth and Budleigh are separated in terms of functionality but this development would effectively merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy HE02 - The bulk of the proposed 700 to 1000 homes for this site will encircle the Grade II* listed St. John in the Wilderness Church and will have significant adverse effects on the remoteness and tranquillity that is so unique to this church, its surroundings and churchyard. This development will drastically alter this peaceful and tranquil setting, not only for the congregation, but also the numerous visitors that come to pay their respect's to their relatives in the churchyard, and also those that visit the area to see the church and its settings.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This will destroy the setting around our Church, stop this now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL01. The site is noted for its dark skies, tranquillity and wildness. Along with the new light from the proposed housing development itself, and with the main access for the site being onto the B3179, which is directly opposite the SPA/SAC/SSSI, this would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Pebblebed Heaths as vehicles exit the site. St John in the Wilderness church and its surrounding area is noted for its remoteness, tranquillity, and the dark skies (especially when within the churchyard itself). The proposed site will encircle this Grade II* listed Church and churchyard, which will result in its tranquility, remoteness and dark skies being lost forever, regardless of any buffer zone being provided.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines ‘irreplaceable habitat’ as “habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed”. Development of this site will result in the loss of irreplaceable habitats. This site has a vast amount of mature trees, which provide unique micro habitats and any loss cannot simply be mitigated by planting new trees. This site also contains many long-established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and even if the developers promise that space can be left around them, degradation and fragmentation of habitat is unavoidable. The variety of wildlife that live and frequent in these fields, trees and hedgerows, will undoubtedly be affected by this development. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. The whole of this site lies within an identified ‘Strategic Nature Area’ (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the SSSI Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by this development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the plan.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 13.23. The whole of this site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network. This site provides a means of connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of this site. The amount of wildlife that utilises this land and the nearby SSSI Pebblebed Heaths is diverse. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of this SPA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop destroying the natural environment, choose another more acceptable area to build.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with paragraph 2.10, objective 8. This will result in the loss of a considerable amount of land that provides an abundance of biodiversity, both on site and on the adjacent SAC/SPA/SSSI. This will adversely affect the natural environment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop destroying this land, remove Exmo_20 from the plan now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy PB04. With the majority of the traffic from this site going via the B3179 which runs along the edge of the SSSI Pebblebed Heaths (SAC/SPA), the emissions/pollution created will undoubtedly impact the air quality in this area. The Habitats Regulations Assessment (dated 30.01.25) highlights that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).”

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop this site now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL09. The main access point for this site is via the B3179 which runs along the edge of the SSSI Pebblebed Heaths. The emissions for this increase in traffic will have a huge impact on the air quality here. This is highlighted in the Habitats Regulations Assessment (dated 30.01.25) which confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan, stop it now.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with policy PB01 and is not in accordance with the mitigation strategy. The number of houses being proposed at this site will cause considerable harm to the SSSI Pebblebed Heaths . There must be numerous alternative sites that could accommodate the housing requirement which would cause less or no harm to the SSSI Pebblebed Heaths (SAC/SPA).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the plan

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 2.6; The land to be destroyed by this development is currently open countryside, with a grade II * listed Church and churchyard in the middle of it. This is not a small development. It is a vast development within a rural part of East Devon.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop promoting this site.

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. The main access point via the B3179 for this development will generate major amounts of vehicle movements just to access services within Exmouth and the neighbouring villages. The site slopes steeply downwards from top to bottom and is within a remote location far from infrastructure and services. The majority of travelling from this car will be done via car as the walking or cycling routes provided with this site will provide limited viable alternative options. The local plan states that congestion is a particular issue in Western East Devon, and with this site having no (or limited) access to Dinan Way and the A376, the bulk of the vehicle movements from this site will be on rural B roads, which are already congested and in need of improvement.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 3.34: Exmouth may be classed as a tier 1 settlement, however, it does not have sufficient infrastructure and services for the existing population, never mind these proposed additions. This development will not add another Doctors surgery or Dentists surgery - both of which are already insufficient for the current population of Exmouth. Nor will it provide another secondary school - which the area is crying out for. There is already a major sewerage issue in the town and surrounding areas, with sewage being discharged into the sea and onto our park areas on a regular basis, and this is before any additional developments adding to the problem.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove this site from the plan

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 11.2. According to the plan, the 'bulk' of the development will utilise the access point at the North of the site via the B3179. This will result in increased car travel requirements for the majority (if not all) of the site. The B3179 access point is adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, so a 0.3 of a mile drive just to get from the site entrance to the housing, and therefore, upwards of over 0.5 miles of 'on site' driving for most residents every time they went out and returned home. In addition to this, from the B3179 site entrance you need to drive between 4.0-4.3 miles to get into Exmouth centre. This site is a large site and its positioning does not promote less travel, nor will it do anything to reduce traffic congestion in and out of Exmouth. This site cannot be classed as sustainable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20 is not sustainable, remove from the plan

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy TR01. Walking and/or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc. as the distances are too far. The studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, however, beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Residents living at the Northern part of this site will have to walk nearly 0.5 miles to get to the bottom of the site. This site is remote, and residents will have to travel significantly further than 0.5 miles or even 1 mile to get to essential services etc. . Walking or cycling as first choice of transport for this site is not realistic. The provision of walking routes, cycle paths or public transport will not alleviate the amount of car journeys this development would generate, especially taking into account the fact that the site slopes steeply from North to South, and the distance people will have to travel to access essential services/facilities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop promoting Exmo_20

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal of site Exmo_20 is in conflict with paragraph 11.6. This is the largest development in Exmouth. Key services and facilities for the majority (if not all) of this site are not within the stated 800m (approx 10 mins walk). The likelihood is that residents will need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring towns/villages. This site slopes steeply upwards from South to North and does not promote walking or cycling, especially not for shopping, doctors, dentists, school, etc.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

Full name: Alison Jane Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy SP01. The proposal for Exmo_20 is for the 'bulk' of the development to utilise the access route at the northern part of the site via the B3179. Exmouth town centre is approximately 4.2 miles from this access point, yet Budleigh town centre is only approximately 2.2 miles away. How can this site be considered to be a development in Exmouth? Based on this information this site is an unsustainable location.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop Exmo_20

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The plan has not been in accordance with the PCPA 2004 Section 33A. Exmo_20 was deemed 'not suitable or achievable' within the HELAA Report November 2022. It has never been either preferred or 2nd choice, therefore the site and was therefore NOT put forward for the Regulation 18 consultations. Therefore, the public and relevant stakeholders including Statutory Bodies (e.g. Natural England, Devon County Council, etc.) have not had a chance to consult on site Exmo_20.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with the PCPA 2004. Exmo_20 was deemed "not suitable or achievable" within the HELAA Report November 2022. This site has never been either preferred or 2nd choice and was therefore NOT put forward for the Regulation 18 consultations. At the Strategic Planning Committee meeting on the 3rd September 2024, the site was 'recreated' as a result of sites Exmo_20a and Exmo_20b being put forward as allocated. The site Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022, and as of the 3rd September 2024 there has been no further consideration or representation permitted by the public or the strategic planning committee, despite numerous requests to do so.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The plan making process for site Exmo_20 has not been in accordance with NPPF Chapter 3. Exmo_20 was deemed "not suitable or achievable" within the HELAA Report November 2022. This site has never been either preferred or 2nd choice and was therefore NOT put forward for the Regulation 18 consultations. At the Strategic Planning Committee meeting on the 3rd September 2024, the site was 'recreated' as a result of sites Exmo_20a and Exmo_20b being put forward as allocated. The site Exmo_20 has NEVER been consulted on or put forward as a 'whole site', since it was deemed 'not suitable or achievable' in the HELAA report back in November 2022, and as of the 3rd September 2024 there has been no further consideration or representation permitted by the public or the strategic planning committee, despite numerous requests to do so.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with policy AR01(B). The proposed site sits upstream of Exmouth on the main rainwater catchment area of Withycombe Brook. The subsoil is heavy clay, the impermeable nature of which makes soakaways ineffective, with the land often being waterlogged. Development on this steep site would significantly exacerbate the already identified flood risk through the lower lying land at the bottom of the site and down through Withycombe.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with paragraph 3.30. The settlement boundary around Exmouth has been extended to include not only the land which housing will be built on but also to include the 400m buffer zone adjoining the Pebblebed Heaths, effectively defining this land as acceptable for development. Although housing cannot be built on the buffer zone, by including it within the settlement boundary indicates that it may be available for other kinds of development. Therefore, the plan fails to robustly protect against adverse effects of recreational use etc in relation to the SSSI Pebblebed Heaths.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Show the 400m buffer zone on the maps associated with site Exmo_20.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with policy OL05. The main access point for this site (via the B3179) is between 4 and 4.3 miles from the centre of Exmouth and only 2.2 miles from the centre of Budleigh Salterton, making Budleigh significantly more accessible to the residents of this development. The access arrangement for the site leads naturally down the B3179 into Budleigh Salterton High Street, but to get into Exmouth will mean travelling twice the distance and having to go around the edge of Exmouth to get back down into it. The High Street, Doctor's surgery, Dentists, schools, beach etc in Budleigh would be the most accessible and obvious choices for residents of this site. Currently Exmouth and Budleigh are separated in terms of functionality but this development would effectively merge the two, with residents living in one town whilst relying on day-to-day services and infrastructure of the other.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with policy HE02 - this proposed site is a 'very large' development of between 700 to 1000 homes. The majority of these homes will surround the Grade II* listed St. John in the Wilderness Church and will have significant adverse effects on the remoteness and tranquillity that is so unique to this church, its surroundings and the churchyard. This development will drastically alter the peaceful and tranquil setting, not only for the congregation, but also the numerous visitors that come to pay their respect's to their relatives in the churchyard, but also to see the church and its setting.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Proposed site Exmo_20 is in conflict with policy OL01. The site is distinctive for its dark skies, tranquillity and wildness. In addition to light from the proposed housing development itself, with the 'majority/bulk' of this sites access being at the B3179, directly opposite the SPA/SAC/SSSI, would cause a significant flow of car headlights destroying the darkness across the entire length of the site and all shining directly onto the Pebblebed Heaths as vehicles exit the site. The area around St John in the Wilderness church is characterised by its remoteness, tranquillity, and the dark skies (especially when within the churchyard itself). This provides a 'wilderness' setting integral to the grade II* listed church which would be lost forever by having a housing development encircling it, regardless of any buffer zone being provided.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal for Exmo_20 is in conflict with paragraph 13.9. The NATIONAL PLANNING POLICY FRAMEWORK defines 'irreplaceable habitat' as "habitats which would be technically very difficult (or take a significant time) to restore, recreate or replace once destroyed". Exmo_20 will cause loss of irreplaceable habitats. It has a great number of mature trees, which provide unique micro habitats and their loss cannot simply be mitigated by planting new trees. This site also contains many long-established hedgerows across the site, the lengths of which are considerable. The trees and hedgerows have high intrinsic biodiversity value providing habitats and wildlife corridors, and even if the developers promise that space can be left around them, degradation and fragmentation of habitat is unavoidable. The variety of wildlife that abound in these fields, trees and hedgerows will undoubtedly be affected by this development. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of the SPA. The whole of the Exmo_20 site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network, part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the SSSI Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by this development.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposed site Exmo_20 is in conflict with paragraph 13.23. The whole of this site lies within an identified 'Strategic Nature Area' (SNA 368) on the Nature Recovery Network. It is part of the Local Nature Recovery Strategy aimed at combining existing wildlife sites and extending habitats. It provides connecting habitats and wildlife corridors between the Pebblebed Heaths at the north of the site through to the woodland at the south and beyond, all of which would be adversely impacted by the development of this site. The amount of wildlife that utilises this land and the nearby SSSI Pebblebed Heaths is diverse. Of particular note is the Nightjar, a qualifying feature of the East Devon Heaths SPA, and studies show that these fly up to 7km from nesting sites to feed at night. Loss of foraging habitat or disruption of routes to feeding areas could undermine the conservation objectives of this SPA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not take site Exmo_20 forward.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with paragraph 2.10, objective 8. It will adversely affect the natural environment and result in the loss of a considerable amount of land that provides an abundance of biodiversity, both on site and on the adjacent SAC/SPA/SSSI.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy PB04. The Habitats Regulations Assessment (dated 30.01.25) confirms that there is “currently not sufficient certainty to rule out advert effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA).” This site sits on the edge of the East Devon Pebblebed Heaths SAC/SPA, and with the proposed ‘majority/bulk’ of the traffic from this site going onto the B3179, the air quality will not be improved.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not take site Exmo_20 any further.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy OL09. The Habitats Regulations Assessment (dated 30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA)”. With the ‘majority/bulk’ of the development being accessed via the B3179, this means that there will be a significant increase in traffic and emissions along the boundary of the Pebblebed Heath.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Site Exmo_20 is in conflict with policy PB01 and is not in accordance with the mitigation strategy. The number of houses being proposed at this site could be accommodated via alternative site(s) which would cause less or no harm to the SSSI Pebblebed Heaths (SAC/SPA).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal to allocate site Exmo_20 is in conflict with paragraph 2.6; The land proposed for development under Exmo_20 is currently open countryside, with a grade II * listed Church and churchyard at the middle of it. This is not a 'modest' development. It is a 'very large' development within a rural part of East Devon.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with policy TR03, and figure 7 in the Local Plan. Due to the proposed access restrictions for this site, the development will generate significant amounts of vehicle movements just to access services within Exmouth and the neighbouring towns/villages using the B3179. The site slopes steeply downwards from North to South and is a remote location from infrastructure and services. Any walking or cycling routes provided with this site will provide limited viable alternative options, with most travelling been done via car. The local plan notes that congestion is a particular issue in Western East Devon, and with this site having no (or limited) access to Dinan Way and the A376, the significant amounts of vehicle movements from this site will be on rural B roads, which are already notorious for being congested and in need of improvement.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with paragraph 3.34: Although Exmouth is classed as a tier 1 settlement, it does not have sufficient infrastructure and services for the existing population. Even if the proposed development brings financial contributions towards infrastructure etc., it will not add another Doctors surgery or Dentists surgery - both of which are already insufficient for the current population of Exmouth. Neither will it provide another secondary school - numerous children already have had to travel to Cranbrook for secondary school provision due to there being no capacity at Exmouth Community College. The existing sewerage system in Exmouth cannot handle the current population, with sewage being discharged into the sea on a very regular basis, with 'closed for swimming' notices becoming a regular feature on our beach. Not a very good advertisement for a seaside tourist spot! Exmouth's sewerage problems have already been highlighted on national news several times.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove site Exmo_20 from the local plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Exmo_20 is in conflict with paragraph 11.2. There are two proposed access points for this site. One to be created at the South of the site via the existing Southern Wood cul-de-sac but only to accommodate 'modest' development, with the other access point being at the North of the site for the 'majority/bulk' of the development via the B3179. This will increase travel needs and necessitate cars to take longer routes for the majority (if not all) of the site. The main vehicular access point (B3179) is at the very northern edge of the site, adjacent to the Pebblebed Heath (SAC/SPA/SSSI). Due to the mandatory 400m buffer zone to SAC/SPA/SSSI no housing is permitted within the top 400m, resulting in approximately 0.3 of a mile drive just to get from the site entrance to the housing. This would result in upwards of over 0.5 miles of 'on site' driving for most people every time they went out anywhere and returned home. In addition to this, from the B3179 site entrance you need to drive between 4.0-4.3 miles to get into Exmouth centre. Exmo_20 is a large site and its positioning does not promote less travel, nor will it do anything to reduce traffic congestion in and out of Exmouth. This site is not sustainable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the local plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Allocating Exmo_20 is in conflict with policy TR01. No matter what the developers say, walking and/or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc. because the distances are too far. The studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, however, beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. If people live at the Northern part of this site, they will have to walk nearly 0.5 miles to get to the bottom of the site. Exmo_20 is by its position remote, and people will have to travel significantly further than 0.5 miles or even 1 mile to get to essential infrastructure and services. Based on this, walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will not alleviate the amount of car journeys this development would generate, especially taking into account the steep local topography and the distance people will have to travel to access essential infrastructure and services.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The proposal of site Exmo_20 is in conflict with paragraph 11.6. This is a large development of between 700 to 1000 homes. The majority (if not all) of this site is NOT within 800m (approx 10 mins walk) of any existing key services and facilities. There are no plans to provide significant key services on site so residents will likely need to drive over two miles (via the B3179) to access them within Exmouth or neighbouring settlements. The topography of the site does not promote walking or cycling, especially not for shopping, doctors, dentists, school, etc.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Do not take Exmo_20 any further forward. Remove it from the Local Plan

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The allocation of Exmo_20 goes against policy SP01. The designated access point for the 'bulk' of the development on this site (via the B3179) is over 4 miles by car from Exmouth town centre yet just over 2 miles from Budleigh Salterton town centre. How can this be considered to be a development in Exmouth. Exmouth cannot take any further development, we have the sea to the south, the estuary on the west and the SSSI (Pebblebed Heaths) to the east. The only option is to develop on the North side which is totally unsuitable for further significant growth. Any new development is closer to neighbouring towns & villages and therefore not a development at the principal centre of Exmouth. Development of Exmo_20 is unsustainable due to its distance from Exmouth town and any services/facilities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Stop promoting Exmo_20 as a viable development, and stop pushing more and more development on to a town that has massive infrastructure issues without adding to them.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD02

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

There are inconsistencies within the policies SP04, SD01 and SD02. Site Axmi_11c is described within SD02, yet site Axmi_11a is mentioned within the Spatial Strategy SP04 on page 39. Where did Axmi_11c come from as this was not in Reg 18? Site reference GH/ED/80a is described within SD02, yet site GH/ED/80 is mentioned within the Spatial Strategy SP04 on page 39, and is also mentioned within the description for site reference Axmi_22 in SD02. Site reference Exmo_20 is described within SD01, yet site reference Exmo_20b is mentioned within the Spatial Strategy SP04 on page 39.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Resolve the inconsistencies identified.

Full name: Nigel Humphrey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

GH/ED/39 was identified within the HELAA Appendix E(v)1 list and should have failed site sifting. Then suddenly on the 1st November two New sites GH/ED/39a and GH/ED/39b were created. These two new sites were put into Reg 18, with site GH/ED/39a being promoted as a 'preferred' site, and GH/ED/39b being classed as 'rejected'. I still do not understand how a site identified as 'NOT suitable or achievable' in HELAA suddenly becomes a 'preferred' site. What is even more baffling is the fact that the description for site GH/ED/39a in Reg 18 has the following first sentence: 'Whilst this site did not pass the Stage 2 HELAA Panel assessment, it was deemed appropriate to appraise, given known developer interest in the site and potential that is felt to exist to overcome possible constraints, notably in respect of highway considerations.'. The description identifies that it did not pass Stage 2 HELAA, so according to the 'Site Selection Methodology' in effect at the time (dated May2022), it should not have been put forward for consultation. Then to even add more confusion, the description indicates that another reason for putting it forward for consultation was due to the fact that there was 'known developer interest in the site'. WHAT SITE DOES NOT HAVE DEVELOPER INTEREST IN IT.

The reason(s) given for putting this forward are dubious to say the least. If EDDC are not going to follow their own methodologies and report findings, then why bother with them, and what confidence do we have that other processes and procedures have not been ignored??

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the

relevant policy or paragraph. Please be as precise as possible.: Remove site GH/ED/39 (and therefore GH/ED39a and GH/ED/39b) 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.:

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-](https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744381242/projects/6734d674023a1f95dd0a926c/respondent-upload/gjwbmi6orbd5d1akjosi.pdf)

[limited/image/upload/v1744381242/projects/6734d674023a1f95dd0a926c/respondent-upload/gjwbmi6orbd5d1akjosi.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-](https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744381247/projects/6734d674023a1f95dd0a926c/respondent-upload/xd3qonuvxcstaorwtfvp.pdf)

[limited/image/upload/v1744381247/projects/6734d674023a1f95dd0a926c/respondent-upload/xd3qonuvxcstaorwtfvp.pdf](https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744381247/projects/6734d674023a1f95dd0a926c/respondent-upload/xd3qonuvxcstaorwtfvp.pdf); Email including map issues.pdf:

[https://res.cloudinary.com/commonplace-digital-](https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744381245/projects/6734d674023a1f95dd0a926c/respondent-upload/wwcfve6pvwkqqkfukxa0.pdf)

[limited/image/upload/v1744381245/projects/6734d674023a1f95dd0a926c/respondent-upload/wwcfve6pvwkqqkfukxa0.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-](https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744381243/projects/6734d674023a1f95dd0a926c/respondent-upload/bii9z7ndekvo9nq5uni3.pdf)

[limited/image/upload/v1744381243/projects/6734d674023a1f95dd0a926c/respondent-upload/bii9z7ndekvo9nq5uni3.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->

First Regulation 19 Consultation – East Devon Local Plan – Responses by Name

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/lbiuschwfc6m6nfujzs45.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 Lym_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/feeu5l7osb3lh5k4mfdr.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>

Chrissie Hunn

Full name: Chrissie Hunn

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 12

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.: I believe the Our Outstanding Landscape chapter is legally compliant, however, the plan overall is not compliant with this chapter or the overarching planning framework and legislation.

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The inclusion of EXMO_17 is not in compliance with this chapter therefore should be removed from the local plan.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: Whilst the Our Outstanding Landscape chapter is sound, the plan as a whole does not comply with either the chapter or the wider planning framework. The statutory duty needs to be considered in tandem with the National Planning Policy Framework (NPPF), in particular paragraphs 11, 182 and 183. Paragraph 182 of the NPPF (2023) sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in national Landscapes, whereas conservation and enhancement of wildlife and cultural heritage are important considerations. However, it is important to remember that natural beauty is not just the look of the landscape, but includes landform and geology, plants and animals, landscape features, and the rich history of human settlement over the centuries. It includes landscape and scenic quality and natural heritage such as

species, habitats, geology and physical such as wildness, tranquillity and dark skies, and cultural heritage (including cultural traditions and the historic and other built environment that makes the area unique). (Levelling-up and Regeneration Act 2023 section 245; Countryside and Rights of Way Act 2000 section 85). Natural England (2023) states enhanced duty in relation to Protected Landscapes refers to National Landscapes (AONBs) and National Parks. Natural England's Planning policies and decisions must also reflect relevant international obligations and statutory requirements. Historic England make clear that the historic environment is fundamental to the distinctive character, sense of place and natural beauty of each National Landscape. It is the conservation and enhancement of all this natural beauty (usually defined in the specific statutory AONB Management Plan) that is the primary purpose of designation, and that Local Planning Authorities must consider in discharging their duty under CROW Act (2000) s.85. LPAs are advised to ensure internal Local Authority legal teams are aware of the s.85 duty. Use of the relevant AONB Management Plan • The Management Plan, which is a statutory document, which will have been adopted by the Local Authority and which formulates their policy for the management of the area and for the carrying out of their functions in relation to it. It is the key principle for ensuring that the statutory purposes of the National Landscapes are met, and is a material consideration in the planning process.

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Lawrence Hunn

Full name: Lawrence Hunn

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL02

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.: I believe this part of the plan is legally compliant, however other parts of the plan contradict this chapter, such as the proposal of EXMO_17 as a development site. Therefore the plan as a whole is contradictory and not legal.

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of EXMO_17 as a potential development site from the plan.

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.: I believe this chapter is sound but other parts of the plan contradict this chapter, such as the proposed development of EXMO_17. The inclusion of EXMO_17 is contradictory to the plan as a whole and should not be included.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of EXMO_17 as a proposed development area.

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Chrissie Hunn

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

2.9

2. Do you consider that this part of the vision chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the vision chapter is not legally compliant. Please be as precise as possible.: Exmouth 17 is in the National Landscape, but yet is up for potential development of 450 houses. To have major development will permanently negatively affect the existing biodiversity and goes against the increase of protection in legislation by the current government to protect the National Landscape.

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove development sites in protective areas.

3. Do you consider that this part of the vision chapter is sound?: No

4. Do you consider that this part of the vision chapter complies with the duty to cooperate?: No

Full name: Chrissie Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: /////
PART 3 - CONTINUED FROM PART 2 6825b902d0807f0013c3842e /////

There are some hedgerow boundaries with some mature trees. The views from the site are open and exposed, including long distance views. Easterly parts of site are remote from services and facilities and if developed would form a quite large 'tongue of development' projecting into open countryside with visual impacts on areas of open countryside and designated AONB. The site itself is not in the AONB. If site 10 can be rejected for development for these reasons, then so should site 17, which is in the AONB, has better views and quality land, and can be seen from the South West Coast Path. Historic Littleham has a long significant history and is older than Exmouth. It was a Saxon subdivision with its own court and was retained by the Kings of Wessex until the 11th Century when it was given by Edward the Confessor to his Master Ordgar, who then passed it onto the Monastery (Horton in Dorset 970 AD) who held it until the Dissolution of the Monasteries, before descending into the Rolle Family and Lord Clinton. The area has historically been forested and agricultural and used by local Farms including Liverton and Woodlands, once part of the Manor of the Wade in the 1300s. The Drake family are also well linked to the area, having lived at the now Prattshayes in the village, funded the Drake Aisle in the church and being buried there. It's mentioned in the Domesday record of 1086. Over the years the Village has grown and changed. The only area that has relatively unchanged (apart from some former buildings and railway line) is the area that borders Littleham including site 17 with its long agricultural history. On the proposed plan, very little detail is given regarding the local listed church compared to other sites that have been rejected such as site 07 in Exmouth, Bystock Court, which is grade 2 listed. St Margaret's and St Andrews Church, which borders the site is grade 2* which carries much more of a historical significance. Nowhere does the plan mention its grade 2* status. All the plan states is that there is a listed Church to west of site and is of prominence in views and setting for southerly parts of the site as much of the site is remote from church. The site is not remote from the church. The church forms

part of the special distinctive village and rural country feel of the whole site and is a significant heritage asset and has a direct impact on potential scope for accommodating residential development. To have an intensification of urban activity and vehicle movements, could adversely impact on heritage value as could other aspects of urbanisation. One example would be the potential over use of the public access through the churchyard, from site 17 to Littleham Road, south of the site. On the proposed plan it also states that there are no other identified designated heritage features that would impact on site. However, when looking the Historic Environment Records (HERS) there are multiple HER Monuments. The first being that Littleham is the bounds of the original Saxon Manor (MDV41872). The current parish boundaries are unchanged since Edward the Confessor or possibly earlier and the site has always been rural. Others include the 19th Century churchyard (MDV112441); the Exmouth to Budleigh Salterton Branch line Railway (MDV22498); Pond to the East of Capel Lane shown on previous maps including the Littleham Tithe Map of 1844 and is on current OS and Google maps (MDV111969); Extraction Pits on northern part of the site, of probable Post Medieval to Modern Earthwork Pit on aerial photos of 1950 onwards and LiDAR 1998-2012 (MDV106427 and MDV106428); Extraction Pit to the South East of probable Post Medieval to Modern and is visible as an earthwork pit on aerial photos 1946 onwards and on digital LiDAR images 1998-2012 (MDV196331); Pond to the South of Salterton Road on Tithe Map of 1844 and OS Maps (MDV111967); Extraction Pit to the Northwest (MDV106423); possible field boundary to south of Liverton Business Park. Potential Medieval to Post Medieval and visible as a two Cropmark Bank on aerial photos in 1969 (MDV106429); possible Early Medieval to Post Medieval field boundary to the south. Visible as a cropmark ditch on aerial photos in 1969; Orchard Banks to the North of St Margaret's and St Andrew's Church, Littleham. Orchard is likely Post Medieval to Modern. Linear earthwork banks on aerial photos 1946 onwards and digital images taken in 2010 (MDV106422); Earthwork Pit to the north of St Margaret and St Andrews Church, Littleham. Probable Medieval to Post Medieval in origin and is visible on aerial photographs 1950 onwards and LiDAR images 1998-2012. This could possibly be the former Manor House built in the 15th Century and known as The Lords House; and Buildings to the East of Capel Lane (MDV111334). Local to the site are several other listed buildings. These are the Lichfield Gate to the churchyard (grade 2) near the bottom of Littleham road and 1-5 Castle Cottages (grade 2 and HER Monument (MDV51057) which are visible from the site and near potential access to the site. Further away in the village are, Littleham Tithe Barn (grade 2), Mundy's Farm and cottage (grade 2), Green Farm (grade 2) Prattshayes Farm (grade 2) and 2 sets of Gate piers and iron gates at Prattshayes. The churchyard which borders the site contains several prominent resting places including the tomb of Lady Nelson as well as war graves. Littleham Village on the current neighbourhood plan is a potential site for a new conservation area, which it deserves to be. Ecological In the NPPF paragraph 174, planning polices, and decisions should contribute to and enhance natural and local

environment by protecting and enhancing valued landscapes and sites of biodiversity; recognise intrinsic character and beauty of the countryside and its wider benefits. The site is seen as being favourable from an ecological perspective on the proposed plan. However, many ecological considerations have not been considered. AONB positively enhance their beneficial use, provide access and opportunities for recreation, as well as retain and enhance the landscapes visual amenity and biodiversity. The site may not be part of the Pebblebed Heaths on Woodbury Common, but the site does act as a wildlife corridor towards this and is in the AONB. From site 17, you can access Woodbury Common, which is not far away for wildlife. Site 17 is also near World of Country life, that promotes the local habitat for bees and other insects. Also at night site 17, does not suffer from artificial light pollution, which helps to support our nocturnal wildlife. Paragraph 176 in the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONB which have the highest level of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and are given great weight to avoid or minimise adverse impacts on designated areas. There are many local features of interest, notably mature hedgerows, and trees, including Oak trees, which help support the local wildlife. The site is near local woodland and the bordering churchyard offers a biodiversity of local flora and fauna including a habitat for butterflies, birds, bats, and other insects. In certain parts of the churchyard, the grass is not cut to help provide biodiversity. The churchyard also contains a natural burial ground which backs onto site 17. On first looks of site 17, agricultural fields are seen, but on further inspection, the site offers a well-known wildlife habitat for various species including bats, various birds including Green Woodpeckers, badgers, deer, dormice, adders, rare wood crickets, butterflies, dragonflies, and plants. This is signposted on the information boards along the cycle path and walkway that runs through site 17. To develop this site would have a vast detrimental affect on the local wildlife that would permanently destroy their habitats. NPPF paragraph 180 when determining planning applications consider if significant harm to a biodiversity resulting from development cannot be avoided, adequately mitigated, or compensated for it should be refused. This is further supported by the Governments 25-year Environment Plan which sets out goals for improving the environment within a generation and leaving it in a better state. Also, the current landowner of site 17, Devon Clinton Estates on their website states the following: “Doing today what is right for tomorrow”; “By handing on the land to future generations in a better condition”; “By investing in the local community” and “Everything we do is with tomorrow in Mind”. To continue these principles, site 17 should not be developed. The site should be protected from development and the local wildlife habitats and landscape saved for future generations. It is also important to recognise that (P35 paragraph 120b of the NPPF) when making effective use of land, some undeveloped land can perform many functions such as wildlife, recreation, flood risk mitigation,

carbon storage and food production. The East Devon AONB Support farming in the AONB to help protect habitats, species and support local communities in sustainable farming. Over 90 percent of the UK population live in areas where local government has declared a climate emergency. With native species and habitats in decline like never before, AONB partnerships have made a formal commitment of their own to increase scale and pace of delivery of nature in form of the Colchester declaration. Accessibility on the proposed plan it is stated that parts of site fall within 1600m of facilities; parts of the site are close to a frequent bus service and that Littleham village is to the south of the site with an industrial estate to the north, though it is across a busy main road. There is no mention that site 17 is outside the town boundary and is one of the furthest sites away from the town centre. The closest bus service predominantly only covers Exmouth. Buses to Sidmouth are infrequent and to go to Exeter, the best option is to catch the 57 buses from Littleham Cross, which is at least a 25-minute walk away from the closest part of the site. The closest supermarket would more than 1600 metres from the mid to furthest part of the site. There are no shops in Littleham Village and the only amenities are the pub and tearoom. The local primary school on the furthest part of the site would unlikely be in walking distance. The only secondary school is most definitely not in walking distance and the local bus does not go near the secondary school. The secondary school is in cycle distance along the cycle path after Littleham Cross but may not be suitable after dark due to it backing onto gardens from both sides with limited street lighting. The local train station is in the town centre, which is a lot further than 1600 metres from the closest site and would be at least a 60-minute walk. There is no pathway along Castle Lane and no pathway directly outside the site on Salterton Road. The main accessibility along the site is from the cycle path and walkway. Traffic through Littleham can be busy when Devon Cliffs and World of Country life are open. Most employment opportunities are in Exeter, and there are only 2 main roads out of Exmouth due to its location, which are already struggling with excess traffic and will only worsen with more development. Site Constraints on the proposed plan it states that there are no significant site constraints, but there would be expected local constraining within the site due to its size. I disagree with this. This site does have significant site constraints. Firstly, the sites ecological value to the local habitat and wildlife which would be permanently destroyed if development was to go ahead. Secondly the green infrastructure of the former railway line which is now part of the well-established cycle path and walkway. It forms part of the National Cycle Network (Sustrans) NCN2 from Dover to St Austell and the international Tour de Manche between Plymouth and Poole. This is a valued form of green infrastructure valued by not only the local community, but further afield as well. There are 9 design principles to be on the Sustrans including its attraction and enhanced ecological features as well as being safe and accessible traffic free paths. Its currently a free to use and safe path for cyclists and walkers of all ages and accessibility needs, with no risk of potential harm from vehicles. It also helps to support both health and wellbeing of the community,

deliver wider benefits for nature and support efforts to address climate change (an issue raised in the NPPF, p27 paragraph 92c and p28 paragraph 98). This could easily be lost through development due to having to meet set criteria. Paragraph 100 p29 of the NPPF, discusses that planning policies and decisions should protect and enhance public rights of way including current access links to national trails. The site is bordered by both a busy road and 2 lanes, which would struggle to cope with increased traffic as well as adding to increase both environment and noise pollution. There are very limited foot pathways with none on Castle Lane (and unlikely to be) and none outside the site on the busy B3178 (Salterton Road). The only lane that has footpaths is Capel Lane, although not along its full length. The site sits within the local AONB and is outside the BUAB which is on the neighbourhood plan. Within site 17 there are mature hedgerows and trees including Oak, with 2 trees having a TPO. North of the site is the SWW underground reservoir with evidence of possible private piping near this on the site. Devon Air Ambulance are also known to use part of the site to land the helicopter in an emergency for this side of Exmouth. The site also contains multiple HERs and borders the local grade 2* church and its surrounding 12-acre churchyard. Inappropriate development in green belt land including AONBs is treated as being harmful and in paragraph 144 of the National Planning Policy Framework (NPPF) paragraph 172, is a reason for refusal in general development control in AONBs. The Exmouth Neighbourhood Plan argues against any development outside the current BUAB due to the amount of housing development within Exmouth without any provision to improve local infrastructure and does not support any development outside of the BUAB. According to the National Flood and Coastal Erosion Risk Management strategy for England and the South West River Basin Direct Flood Risk Management Plan 2021 to 2027 (December 2022 by the Environment Agency), Littleham is in a flood risk area (FRA). Due to its location, Littleham and parts of site 17 are at risk of fluvial flooding from the Littleham Brook, surface water flooding from runoff and flooding from the drainage network due to the inability of the sewage network to cope during high rainfall and tidal locking. All forms of flooding impact on the local area including the environment, listed buildings, homes and businesses. Littleham, as per the government website, is currently a high-risk area of surface water flooding. Littleham and part of site 17 is in a high-risk fluvial flood zone, which is greater than 3.3% Annual Exceedance Probability (AEP) and not flood zone 2 which is 0.1% AEP on the current draft plan. Within Littleham village there is a history of flooding from the Littleham Brook and surface water runoff from Castle Lane and the Devon Cliffs access road to the south. Replacement of the road culvert has alleviated much of this flooding, but there is still surface flooding in Maer Lane. Due to the area becoming more urbanised, resulting in more surface water runoff and the aging drainage infrastructure there is an increase in risk level. This will only worsen with more development and climate change. Rainfall intensity is expected to increase in the future and cause higher river flows and levels with rapid run off from upper catchments and more flooding. The middle part of

Littleham Brook flows through an urban area which will see an increase in flood frequency and impacts. This is also partly due to the limited scope to increase the capacity of the structures that cross the Littleham Brook which may further constrict flow. Tide locking of the outfall of Littleham Brook into the sea will also occur more frequently due to sea level rise. It is also expected to frequently overload the aging sewage network, placing a greater reliance on pumped systems to disperse the drainage and an increase in pollution. Flooding is also discussed in the NPPF chapter 14 that inappropriate development in areas at risk of flooding should be avoided by directing development from higher risk areas, so as not to increase flood risk elsewhere. All plans should apply a sequential risk-based approach to location of development and consider all sources of flood risk both now and in the future and to safeguard land from development that may be required for future flood management. Site Opportunities Site 17 on the proposed plan is stated as being a large-scale site, that if it is allocated for development as a whole or just parts, it would be expected that a mixed-use development could deliver a range of positive outcomes. I disagree with this. The site is currently used for farming, which is vital if we are to become sustainable. Also, with the closer proximity to Exeter, most employment opportunities are in Exeter, which has better links to other areas of the country compared to Exmouth. The site sits outside of the BUAP and is further away from the town centre. Site 18 in Exmouth, which is land directly to east of Liverton Business Park and is close to site 17, is for employment allocation. Liverton business park tends to have smaller businesses that have lower employment numbers of staff required locally except for 3 businesses. There is currently no need for the site 17 to be developed for other employment uses and would be far better to be kept for farming, where there is a need. Paragraph 177 in the NPPF states when considering applications for development within National Parks, the Broads and AONB permissions should be refused for major development, other than in exceptional circumstances where it can be demonstrated that the development is in the best public interest. Consideration of the following (a) need for development including in terms of any national considerations and the impact of permitting it or refusing it upon local economy; (b) cost of and scope for developing outside designated area, or meeting need for it in some other way; (c) any detrimental effect on environment, landscape and recreational opportunities and extent to which it could be mandated. Footnote 60 p51. For the purposes of paragraphs 176 and 177, whether a proposal is a 'major development' is a matter for the decision maker, considering its natural scale and setting and whether it could have a significant adverse impact in the purposes for which the areas has been designated or defined. There is no clear definition of a major development, but in the NPPF glossary, it is described as a site of more than 10 houses or a site bigger than 0.5 hectares. For site 17, I would consider this as being a major development in the AONB. The housing that is needed in Exmouth is affordable housing for the local community, rather than new houses on the open market (this is supported by NPPF paragraph 78 p21). Brown field sites not allocated for housing, could be used

as Entry level exception sites for first time buyers and those looking to rent their first home. Entry level exception sites are not permitted in AONB and green belt areas (p19 paragraph 72b of the National Planning Policy Framework, 2021). As large-scale developments tend to have very little affordable housing, I can only imagine developers using this to their advantage and limiting the number of affordable homes and instead build unwanted expensive houses that the community does not need and cause a major destruction of the AONB. Paragraph 73 p20 of the NPPF, describes larger scale development as significant extensions to existing villages and towns, that need to be well allocated and designed and supported by necessary infrastructure and facilities including a genuine choice of transport modes, economic potential, and scope for net environmental gains. Also, when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre (NPPF paragraph 88 p25). Site 17 sits outside of the BUAB with poor road infrastructure both locally and outside of Exmouth. Public transport is poor in this area and the site is not well served by local amenities. In the healthcare sector, emergency health care and Gp practices are struggling and there are long waiting lists to join an NHS dentist. There is only 1 local Acute Hospital in Exeter. Due to location of site 17 in the AONB, the opportunity is there for further environmental net gains, provided it is kept free of development such as building on the current biodiversity and habitat protection the site offers. An economic potential is to retain the cycle path and walkway, which also supports green tourism and maintain the rest of the site for agricultural use. This helps to support sustainability and the health and wellbeing of the community. I agree that the whole, the site would be a poor choice for allocation of development, even if only a part of it was developed. Even sites 9 and 15 are considered major development within the AONB, as in appendix 2 in the NPPF a development of more the 10 houses or the site is 0.5 hectares, or more is seen as a major development. Also, the chances are high that any potential housing would be unaffordable for the local community. With the government housing target numbers relaxing and considering the existing character and density of Exmouth, it is a great time to review the housing requirements for Exmouth. The site sits within open countryside inside the AONB and is outside of the BUAB. The site offers far reaching views and feels separate from the urban sprawl of Exmouth. The site has a local intrinsic value that is enjoyed by both the local community and those from further afield. The site has an already established green infrastructure that is enjoyed by those of all ages and abilities and is part of the well-known National Cycle Network and is a viable habitat for the various local wildlife and not of low ecological value as stated in the proposed plan. This would be permanently destroyed with development. The site also borders the grade 2* village church, which is a significant heritage asset and development of the site could have a significant detrimental effect on both the church and the surrounding graveyard and its biodiversity. There are also other grade 2 listed buildings near by as well as HERs. For employment reasons, the site is currently used as agricultural land, which it has been

for many years. To be sustainable, we need our farmland, so we can try to be more carbon neutral and support local farm businesses. If this site was developed, this would be lost forever. The site if developed, would raise significant issues about suitability and desirability of accommodating a major large-scale development in the AONB. The NPPF discusses sustainable development for plan making, and the application of policies in this framework seek to protect areas or assets of particular importance and provides strong reason for restricting overall scale or type of development or destruction of landscape in AONB. The effects of pollution on health, living conditions, natural environment as well as the potential sensitivity of the site that could occur from development should be identified. This includes both air quality, light pollution, and excess noise from traffic. Rejecting site 17 for development will help to protect this tranquil area which has remained relatively undisturbed by noise and pollution. The site is currently prized for its recreational and amenity value including the current habitat and biodiversity; the dark landscape at night, which can aid nature conservation and the cycle path and walkway. To develop site 17 would only lead to increase in noise, pollution and destruction of the local wildlife habitats and amenity value including the health and wellbeing of the community. Also, the site prevents the urban sprawl of Exmouth encroaching further into the much-needed countryside. In November 2022 Historic England and National Landscapes signed joint statement to manage, conserve and celebrate our iconic historic environment. This helps set a precedent on the value that National Landscapes can offer not only the local community, but nationally as well. Too much land designated in the National Landscapes has been lost to development nationally and now the government would like to increase the number of National Landscapes. Site 17 location carries a significantly high amenity value compared to sites that are not in the National Landscapes or near conservation areas. It is a both wildlife corridor for this side of Exmouth and a link to the proposed Mear Valley Park. With the policies regarding the National Landscape and the NPPF, development should not be considered if in conflict with neighbourhood plans. Site 17 being outside of the BUAB is not supported on the neighbourhood plan. Many sites with similar characteristics to site 17 have been rejected, with the issues raised considered significant enough to reject other sites given less weighting for site Exmouth 17. For example, Exmouth site 07 has been rejected due to its proximity to a Grade 2 listed building, but this reasoning has not been applied to Exmouth site 17 which borders the more significant higher graded Grade 2* Church in Littleham. Other examples are as follows: Broadhembury 07, reasons for rejection include high landscape value as it lies within the AONB, and impact on local listed buildings, reasons which are also true for Exmouth 17. Budleigh Salterton 05, reasons for rejection include the existing field forms being an attractive feature and development could affect the setting of designated and non-designated heritage assets. These reasons equally apply to Exmouth site 17 but have not been included in the plan. Chardstock 01, reasons for rejection include being in a National Landscape and having high landscape sensitivity. Both reasons apply to

Exmouth site 17. Confusingly, another reason for rejection is that the site is bordered by agricultural fields despite local residential development providing some context of built form. Whereas this is reasoning is turned upside down for Exmouth 17, where the local residential development providing some context for development is used as a benefit for development. The argument cannot be used both ways. Clyst St Mary – Sowton 01, reasons for rejection include development affecting the special character of local listed heritage assets. A reason which holds true for Exmouth site 17. Clyst St Mary – Sowton 02, reasons for rejection include having a high landscape sensitivity to new development, a reason which holds true for Exmouth site 17. East Budleigh 01, reasons for rejection include location of the site within the AONB and the effect of development on local heritage assets. Reasons which are also true for Exmouth site 17. Exmouth 10/24, reasons for rejection include the open and exposed nature of the site in terms of landscape and its rural rather than urban fringe character. This site is particularly noteworthy since it is located on the opposite side of the B3178 (Salterton Road) from Exmouth site 17. These characteristics apply equally to Exmouth site 17, therefore Exmouth site 17 should be rejected since in addition to its open landscape and rural character, also lies within the AONB. Hawkchurch 02, reason for rejection being the rural, agricultural character of the site, a characteristic shared with Exmouth site 17, despite Hawk 01 being outside the AONB. Honiton 04, reason for rejection being development would have a high landscape impact and the site being within the AONB. Both being reasons against development within Exmouth site 17. Honiton 09, reason for rejection being the site falling within the AONB and having a high impact on the landscape. Despite the site being located next to a major A30 junction and sandwiched between the A30 and Langford Road. Surely the landscape impact of development within Exmouth site 17 must be greater. Honiton 12, reason for rejection being the impact of development on landscape and heritage due its location within the AONB and the adjoining grade 2* church. This is the same situation as Exmouth site 17. Therefore, surely Exmouth site 17 must be rejected for the same reason. There are many other examples of this inconsistent approach to assessing the development potential of Exmouth site 17, which are too numerous to detail here. It is apparent that only the benefits of the development of Exmouth site 17 have been considered any negative impacts glossed over by the plan as it stands. Prior to adoption of the plan, Exmouth 17 must be reassessed as it does not appear that a full assessment of the site has been conducted. A full assessment of the benefits and negative impacts of development within Exmouth site 17 could only conclude that the site be rejected for development within the East Devon Local Plan. This is an area the size of 4 football fields that stretches from opposite McDonalds right down to Castle Lane with industrial units next to Salterton Road plus 410-450 houses. There would be one access road with one exit onto Salterton Road. The access road would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe, alongside many in our community, that our natural beauty should be preserved. EDDC has a legal duty to

'conserve and enhance' National Landscape and I want to stop the loss of our precious space and natural beauty. I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17. Both EDDC and DCC are expected to be clearly demonstrate that they have considered the purposes of the National Landscape designation in their decision making.

Full name: Chrissie Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: /////
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The duty is intended to complement these requirements by ensuring that the purposes for which Protected Landscapes are designated for are recognised in reaching decisions and undertaking activities that impact these areas. Consideration of what is reasonable and proportionate in the context of fulfilling the duty is decided by the relevant authority and should take account of the context of the specific function being exercised. Relevant authorities will need to apply the duty when undertaking any function in relation to, or so as to affect, land in a Protected Landscape. This may include the preparation of Development Plans and associated assessments and documents and decision making in respect of development management, planning applications and nationally significant infrastructure projects, functions outside of a Protected Landscape which may have an effect on land in a Protected Landscape. When seeking to further the purposes, relevant authorities should consider the information contained in a Protected Landscape's Management Plan. Management Plans describe the natural beauty, special qualities and key characteristics of and targets and objectives for the designation. Relevant authorities should make efforts to understand the Management Plan and relate their functions to it. Dialogue with the Protected Landscape team (National Park Authority, Conservation Board, National Landscape Partnership, or Joint Advisory Committee) can assist the relevant authority. A relevant authority should take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes. As far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes. A relevant authority should be able to demonstrate with proportionate, reasoned, and documented evidence the measures to which consideration has been given when seeking to further the statutory purposes of Protected Landscapes - for example, policies, strategies, operational

procedures, estate management plans, investment plans, contracts, works instructions, assessments and reports which should be able to evidence the proper discharge of the duty by the relevant authority. For development plan making and development management decisions affecting a Protected Landscape, a relevant authority should seek to further the purposes of the Protected Landscape - in so doing, the relevant authority should consider whether such measures can be embedded in the design of plans and proposals, where reasonably practical and operationally feasible. For the development and management of land, water and estates, relevant authorities should seek to further the purposes of the Protected Landscape when designing and undertaking these activities, where reasonably practical and operationally feasible. What are the statutory purposes that you should seek to further when exercising a function in the Protected Landscape it affects? Do measures which would further the purposes align with and help to deliver the targets and objectives in the Protected Landscape's Management Plan? Are such measures appropriate and proportionate to the type and scale of the function and its implications for the area? For instance, are measures in keeping with the natural beauty, the special qualities and key characteristics of the Protected Landscape? Could the measures contribute to the conservation and enhancement of the Protected Landscape's wildlife, ecological value and quality, geological and physiographical features, water environment, cultural heritage, dark skies, tranquillity, opportunities for access to nature, and landscape character for which the area was designated? Has the relevant Protected Landscape team been approached for their views on whether or not measures help to deliver the Protected Landscape's Management Plan and further the purposes of the designation? Public authorities must also comply with the strengthened Biodiversity Duty that the Environment Act 2021 introduced. You should consider how your actions taken to comply with the Biodiversity Duty are complementary and if you have met both duties in full through your decision. The statutory purposes of National Landscapes (areas of outstanding natural beauty) are conserving and enhancing the natural beauty of the area of outstanding natural beauty. The statutory purposes of National Landscapes (areas of outstanding natural beauty) with Conservation Boards are conserving and enhancing the natural beauty of the area of outstanding natural beauty and increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty. The Management Plan describes the natural beauty, special qualities and key characteristics of a Protected Landscape. This will articulate the features of the landscape which warrant its nationally designated and protected status. The duty also applies to functions undertaken outside of the designation boundary which affects land within the Protected Landscape. Natural beauty, special qualities, and key characteristics can be highly dependent on the contribution provided by the setting of a Protected Landscape. Aspects such as tranquillity, dark skies, a sense of remoteness, wildness, cultural heritage or long views from and into the Protected Landscape may draw upon the landscape character and quality of the setting.

Functional connectivity is also important where there are flows or close interconnection between the Protected Landscape and its setting, for example a shared water catchment and management of water resources; ecological connectivity where species are able to move across and between the designated and non-designated area; Rights of Way, Open Access Land and other recreational links joining the designated area to the wider countryside. Development and the management of land, water and estates located in the setting have the potential to adversely affect the natural beauty, special qualities, and key characteristics of a Protected Landscape. On 21st March 2025 it was published a meeting of major landowners to boost nature's recovery to discuss land management plans to meet the country's legal Environmental Act targets (Department for Environment Food and Rural Affairs and The Rt Hon Steve Reed OBE MP). It is part of Government's commitment to transform how we use land in this country to protect the environment, support economic growth and deliver on our Plan for Change. It will play a pivotal role in supporting the Government's ambitious environmental goals, including statutory targets in the Environment Act and our commitment to protect 30% of land by 2030. With the natural world facing species decline and a biodiversity crisis, Reed called on the group for action to collectively protect and restore nature on their estates across England. Landowners must go further and faster to restore our natural world. The 'National Estate for Nature', who manage a tenth of the land in this country, have a responsibility to future generations to leave the environment in a better state. We have a unique opportunity to work together on common sense changes that create a win-win for nature, the economy, and make the best use of the land around us. Tony Juniper, Chair of Natural England talked of if we are to reverse the historic declines in nature, we must take urgent action at every level to restore nature on the ground. This group is an important first step in securing a strong commitments from landowners across the country to collaborate on managing land in a more sustainable way, for the benefit of both people and nature. We need work together to find the long-term solutions for key challenges, such as the demand for new homes and infrastructure, and the need to halt long-term biodiversity loss and recover nature. Harry Bowell, Director of Land and Nature at the National Trust said as the Government's Land Use Framework makes clear, a transformation in the use of land is needed if we are to meet our nature and climate targets. Only by working together will be able to restore our landscapes at the scale needed to put nature in recovery by 2030, lock up enough carbon in the English countryside to reduce greenhouse gas emissions to required levels, and prepare for the worsening impacts of climate change. We are committed to playing our part. It represents institutions with significant holdings across the country, and associated significant potential to drive nature's recovery, a vital part of the government's national conversation about land use ahead of publishing a Land Use Framework in 2025. The broad representation also ensures that the group can draw on a wealth of expertise and experience in land management, conservation, and sustainable development, enabling them to develop and implement effective strategies for nature recovery, sustainable

land use, and environmental protection. Defra will actively participate as a member, leading by example and supporting the group with guidance, resources, and coordination as they work toward meeting the Government's environmental targets. Further quarterly meetings will focus on developing and implementing agreed on-the-ground plans to drive nature's recovery. This comes following the introduction of new measures to strengthen our protected areas and meet 30by30 that show this government is committed to delivering for nature. As part of the government's Environmental Improvement Plan (EIP), everyone, from land managers to homeowners, has a crucial role to play in restoring the natural environment. 'Protected Landscapes' refers to National Parks, the Norfolk and Suffolk Broads and National Landscapes in England. 'National Landscapes' is the rebranded name for areas of outstanding natural beauty (AONBs). The Protected Landscapes duty is intended to operate and provides broad principles to guide relevant authorities in complying with it. Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA) amends the duty on relevant authorities in respect of their functions which affect land in National Parks, National Landscapes, and the Norfolk and Suffolk Broads (collectively referred to as Protected Landscapes) in England. Relevant authorities must now 'seek to further' the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes. The duty is intended to facilitate better outcomes for England's Protected Landscapes, which are in line with their statutory purposes. The duty does not prevent relevant authorities from undertaking their statutory functions and discharging their legal duties and other responsibilities. The duty is intended to complement these requirements by ensuring that the purposes for which Protected Landscapes are designated for are recognised in reaching decisions and undertaking activities that impact these areas. Consideration of what is reasonable and proportionate in the context of fulfilling the duty is decided by the relevant authority and should take account of the context of the specific function being exercised. Relevant authorities will need to apply the duty when undertaking any function in relation to, or so as to affect, land in a Protected Landscape. The preparation of Development Plans and associated assessments and documents; decision making in respect of development management, planning applications and nationally significant infrastructure projects; functions outside of a Protected Landscape which may have an effect on land in a Protected Landscape; the drafting of Protected Landscape Management Plans; planning appeals and public inquiries; the drafting of Local Nature Recovery Strategies; other plans such as Neighbourhood Plans. When seeking to further the purposes, relevant authorities should consider the information contained in a Protected Landscape's Management Plan. Management Plans describe the natural beauty, special qualities and key characteristics of and targets and objectives for the designation. Relevant authorities should make efforts to understand the Management Plan and relate their functions to it. Dialogue with the Protected Landscape team (National Park Authority, Conservation Board, National Landscape Partnership, or Joint

Advisory Committee) can assist the relevant authority. Relevant authorities should also refer to the Protected Landscapes Targets and Outcomes Framework. A relevant authority should take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes. As far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes. A relevant authority should be able to demonstrate with proportionate, reasoned, and documented evidence the measures to which consideration has been given when seeking to further the statutory purposes of Protected Landscapes - for example, policies, strategies, operational procedures, estate management plans, investment plans, contracts, works instructions, assessments and reports which should be able to evidence the proper discharge of the duty by the relevant authority. For development plan making and development management decisions affecting a Protected Landscape, a relevant authority should seek to further the purposes of the Protected Landscape - in so doing, the relevant authority should consider whether such measures can be embedded in the design of plans and proposals, where reasonably practical and operationally feasible. For the development and management of land, water and estates, relevant authorities should seek to further the purposes of the Protected Landscape when designing and undertaking these activities, where reasonably practical and operationally feasible. What are the statutory purposes that you should seek to further when exercising a function in the Protected Landscape it affects? Do measures which would further the purposes align with and help to deliver the targets and objectives in the Protected Landscape's Management Plan? Are such measures appropriate and proportionate to the type and scale of the function and its implications for the area? For instance, are measures in keeping with the natural beauty, the special qualities and key characteristics of the Protected Landscape? Could the measures contribute to the conservation and enhancement of the Protected Landscape's wildlife, ecological value and quality, geological and physiographical features, water environment, cultural heritage, dark skies, tranquillity, opportunities for access to nature, and landscape character for which the area was designated? Are there ongoing management needs for these measures? How will the measures be funded and secured? Has the relevant Protected Landscape team been approached for their views on whether or not measures help to deliver the Protected Landscape's Management Plan and further the purposes of the designation? Public authorities must also comply with the strengthened Biodiversity Duty that the Environment Act 2021 introduced. You should consider how your actions taken to comply with the Biodiversity Duty are complementary and if you have met both duties in full through your decisions. The statutory purposes of National Landscapes (areas of outstanding natural beauty) are:

- conserving and enhancing the natural beauty of the area of outstanding natural beauty The statutory purposes of National Landscapes (areas of outstanding natural beauty) with Conservation Boards are:
- conserving and enhancing the natural beauty of the area of outstanding natural beauty
- increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty The Management Plan describes the natural beauty, special qualities and key characteristics of a Protected Landscape. This will articulate the features of the landscape which warrant its nationally designated and protected status. The duty also applies to functions undertaken outside of the designation boundary which affects land within the Protected Landscape. Natural beauty, special qualities, and key characteristics can be highly dependent on the contribution provided by the setting of a Protected Landscape. Aspects such as tranquillity, dark skies, a sense of remoteness, wildness, cultural heritage or long views from and into the Protected Landscape may draw upon the landscape character and quality of the setting. Functional connectivity is also important where there are flows or close interconnection between the Protected Landscape and its setting, for example:
 - a shared water catchment and management of water resources
 - ecological connectivity where species are able to move across and between the designated and non-designated area
 - Rights of Way, Open Access Land and other recreational links joining the designated area to the wider countryside Development and the management of land, water and estates located in the setting have the potential to adversely affect the natural beauty, special qualities, and key characteristics of a Protected Landscape.

Response from the National Landscapes Association to the consultation from Ministry of Housing, Communities and Local Government: Proposed reforms to the National Planning Policy Framework and other changes to the planning system September 24

Contact: Ruth Larbey, Policy and Advocacy Manager (ruth.larbey@national-landscapes.org.uk)

The National Landscapes Association (NLA) is a registered charity that supports the mission to conserve and enhance natural beauty in National Landscapes and other protected areas. One of our key aims is to support and develop a network of ambitious National Landscape teams and partnerships that have a strong collective voice and a

positive impact on the places for which they care. This consultation response has been developed by the National Landscapes Association in collaboration with the Planning and Placemaking specialist panel of representatives from across the National Landscapes network.

National Landscapes Association acknowledges the Government's aspiration to build 1.5 million homes over the next five years. Our response to the September 2024 consultation on the National Planning Policy Framework (NPPF) is intended to help ensure that this is done in a way that delivers the right homes in the right places. National Landscapes are areas whose natural beauty is so outstanding that it is in the nation's interest to safeguard them. They are also living and working environments that need to help mitigate and adapt to the impacts of climate change. As such, we recognise that some degree of development may be appropriate in these areas in order to sustain vibrant and thriving local communities and to achieve net zero. This development should be delivered in a way that is compatible with and, ideally, positively contributes to the statutory purpose of conserving and enhancing the natural beauty of these areas.

We support the Government's statement that 'existing protections for land covered by existing designations will be maintained'.¹ However, the proposed reforms would set an expectation for a quantum of housing development, in local authority areas that overlap with National Landscapes, that is likely to result in significant harm to the natural beauty of our National Landscapes. As such, the reforms would conflict with the statutory purpose of conserving and enhancing this natural beauty. The reforms would also conflict with the statutory duty to seek to further this purpose (the 'seek to further' duty).² Therefore, we consider that the proposed reforms would not be legally compliant in this regard.

We believe that the Government's aspiration to build 1.5 million homes over the next five years can be delivered in a way that would be less harmful to the natural beauty of our National Landscapes than would be the case with the proposed reforms. In particular, we recommend that:

- the standard method for calculating housing need should: (i) maintain an urban uplift (with amendments to the current urban uplift calculation); and (ii) reduce the extent to which 'affordability' is factored in (at least compared to the proposed reforms);

- the NPPF should make more explicit reference, including in paragraphs 35(a) and 61, to the fact that there may be circumstances where the protection afforded to areas or assets of particular importance, including National Landscapes, may mean that objectively assessed needs cannot be met in full.

The reduction in the extent to which affordability is factored into the standard method could be balanced by maintaining an urban uplift, thereby still achieving the target of 1.5 million homes over five years (an average of 300,000 homes per annum). The National Landscapes Association supports the national aspirations to achieve ‘net zero’. However, we are concerned about the proposed wording at the start of paragraph 164, which states that ‘local planning authorities should support planning applications for all forms of renewable and low energy development’. This wording could give the impression that all proposals for renewable and low carbon energy should be permitted. This should not be the case, particularly in National Landscapes and their settings, where such proposals, particularly large-scale schemes, could potentially conflict with the statutory purpose of conserving and enhancing natural beauty and with the ‘seek to further’ duty. We recommend that the proposed wording at the start of paragraph 164 should be caveated to make it clear that the impacts of such proposals still need to be addressed as part of the decision-making process, including in the overall planning balance. As indicated above, we support the fact that the Government is maintaining (i.e. not weakening) the protection afforded to land covered by existing designations. However, with regards to National Landscapes, we consider that it would be appropriate to strengthen this protection, rather than just maintaining it. For example, we recommend that paragraphs 182 and 183 of the NPPF should be strengthened to better reflect the ‘seek to further’ duty. We acknowledge that the Government isn’t seeking views on this issue through the current consultation. However, we would like to engage with the Government to discuss how this issue might be addressed in any future NPPF consultations. In the site selection report for Exmouth published in August 2024, Exmo_24, land to the north of Salterton road (opposite this site) and sits just north of the ED national landscape, the site was rejected for allocation as not seen as appropriate due to being quiet open and exposed in landscape terms and large parts have a rural rather than urban fringe character. East parts are remote from services and facilities and if developed would form a quite a large tongue of development projecting into open countryside and designated national landscape. On account of potential adverse impacts the site is not recommended for development, this would have been for 250 houses. Exmo_17 was agreed for allocating despite being a poor choice for development but in context of plan strategy directing large scale development to Exmouth on balance despite site limitation considerations allocation is seen as appropriate. Sensitive in landscape terms with extensive views south, more tranquil and more stark north, but the report fails to mention the wide views you get

from the top of the site. Fields of low ecological value do still provide a habitat for wildlife. Deer have been seen in the fields. There is not a frequent bus service. Littleham village has a pub, a seasonal café but no shops. The neighbourhood plan talks of the built up area boundary (BUAB) to cater for and contain the town and future planned development needs to protect the open countryside. There is a presumption against development in the National Landscape outside of the defined boundary. This is particularly relevant to Exmouth given the very special environment that surrounds it. However, the amount of housing development in Exmouth without the provision of adequate infrastructure argues against any development outside the boundary. The neighbourhood plan will not be allocating sites for housing outside the BUAB. Exmouth should not be a tier 1 site as does not offer potential for accommodating growth and development. Even the EDDC are not based in Exmouth, and instead are based at Honiton. Site Exmo_ 17 is a large, sloped site area of open space that is to the east of the historic Village of Littleham. The entire site is within the National Landscape, formerly Area of Outstanding Natural Beauty (AONB) and sits outside of the built-up area boundary (BUAB). It contains a network of agricultural fields that are currently farmed and a well-established walkway and cycle path, as well as the Littleham Brook and multiple Historic Environment Records (HERS). In the current neighbourhood plan the AONB is a designation that recognises the protection of its special landscape as being of national importance, equal to landscapes of our national parks. It also states that development outside of BUAB will not be supported. According to the draft plan there is no direct infrastructure concerns, but if developed there would be large scale infrastructure needs. The whole site currently does have direct infrastructure concerns. South of the site is Castle Lane, a single narrow country lane with no pavement which is in a high flood zone area (as per the current Environment Agency Flooding Plan) due to proximity to Littleham Brook and surface water run-off. West of the site is Capel Lane, a narrow road, which is sealed off to traffic 1/3 of the way up and is busy already with traffic accessing Littleham Village and the surrounding housing estate. Site 15 would have its access from Capel Lane, and this currently has a tall hedgerow across and is on one of the narrowest parts of the Lane, close to another road junction. Both Capel Lane and Castle Lane join Littleham Road which can be busy with traffic especially when Devon cliffs and World of Country life is open. Access through Littleham Village can be busy due to the bridge access near the Clinton Arms being for single traffic despite being widened in the 1930s. North of the site is B3178 (Salterton Road), a busy main road. The site access that would need to be created is opposite a very busy junction off Liverton Business Park. It is also where the local Ambulance and Fire Station is based. Recently the junction was extended to help ease traffic but has not been effective. Further down (Salterton Road) are traffic lights, but traffic lights here would be ineffective due to the increase in stationary traffic it would cause. There are no public pathways along the site's boundary with Salterton Road and it would be difficult to create a public crossing as Salterton road slopes downwards and vision would be poor for oncoming traffic.

North of the site is next to a very large underground water reservoir and there is evidence of underground piping going southwards through the site, possibly a private network. There is also Littleham ponds which are evidenced on the current OS maps. Littleham Brook runs east to west, south of the site with a pumping station further up. Running east to west through the middle of the site is the former historic Exmouth to Budleigh railway line which is now a well valued cycle path and walkway. It forms part of the National Cycle Network (Sustrans) NCN2 from Dover to St Austell and the international Tour de Manche between Plymouth and Poole. This is a valued form of green infrastructure valued by not only the local community, but further afield as well. There are 9 design principles to be on the Sustrans including its attraction and enhanced ecological features as well as being safe and accessible traffic free paths. Its currently a free to use and safe path for cyclists and walkers of all ages and accessibility needs, with no risk of potential harm from vehicles. It also helps to support both health and wellbeing of the community, deliver wider benefits for nature and support efforts to address climate change (an issue raised in the NPPF, p27 paragraph 92c and p28 paragraph 98). The site sits outside of the BUAB and is further away from local amenities and the town centre. The local historic Littleham village contains a pub, 2 community halls and a seasonal tearoom, but no shops. The closest supermarket and post office from the furthest part of the site would be more than 1600 metres. There is a small Primary School in Littleham but would be some distance from the furthest part of the site. Other primary schools and the only secondary school would not be within walking distance. The bus service is unreliable and the only bus directly to Exeter is now mainly from the town centre (a good hours walk from the closest area of the site). The closest train station is on the outskirts of Exmouth town centre and therefore not local to the site. These issues alone would add to more burdening traffic and an increase in pollution and carbon emission. Site Exmo_17 is protected by the Countryside and Rights Of Way Act 2000 (CROW). It protects the land to conserve and enhance its natural beauty. AONB require good quality scenic landscape that is relative wild due to distance from housing or having few roads, where natural sounds is predominant. It can also include natural heritage features such as habitats and cultural heritage. I agree that site 17 is very sensitive in landscape terms due to its location and visual prominence. The whole site sits within the AONB and sits above the local built-up area. The fields are currently used for agricultural use by the local farms and is rated as good to moderate. The site slopes north to south which offers extensive views into and out of site including from looking into and out of the AONB and the Southwest Coast Path. The whole site is also in the Coastal Preservation Area and borders onto the Jurassic Coastline which is part of the UNESCO World Heritage Site. I disagree that the higher northerly parts are starker, as further north of the site offers some of the best views in Exmouth of the far-reaching views of the AONB, Maer Valley and coastline. The whole site has a particular tranquillity of peace away from traffic and the built-up areas of Exmouth and a distinctive rural countryside feel, that over the years, other areas of

Exmouth has lost to development. The site is also intimate in nature with mature hedgerows and trees, including 2 trees with a TPO. Littleham Brook south of the site, also supports the local natural habitat. The site boarder's local woodland areas, private gardens, and the local churchyard. Currently the churchyard west of the site is an established biodiversity for the local flora and fauna. The whole site offers a habitat as well as a wildlife corridor for local wildlife including Bats, Birds, Hedgehogs, Deer, and Badgers. Looking at the Valley Parks and working draft plan for Exmouth, site 17 is a suggested area of land of local amenity importance due to being outside of the BUAP and in the AONB and could easily join up to the Maer Valley Park, a supposed greenspace for the community to access and enjoy. The site would also make a wonderful Dark Night at Skies protected area due to having very little light pollution facing eastwards and the only light comes from the odd farmhouse. The dark skies also help to support the local nocturnal wildlife. Paragraph 84 of the NPPF supports the need of open space. Exmouth Site 10, land to the North of B3178 (Salterton Road) was rejected for similar reasons that site 17 has. Site 10 consists of improved grassland fields that are open and exposed in landscape terms and large parts have a rural rather than urban fringe character.

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Full name: Chrissie Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please stop the idea of building on a protected area of the National Landscape on the eastern edge of Exmouth (Exmo_17), which is outside the Exmouth Town Build Up Area Boundary (BUAB), that was agreed in the Neighbourhood plan in 2015. The Plan was to provide the community's vision for the future until 2031 and set out clear planning policies to realise the vision and to sit alongside the East Devon Local Plan (EDLP) at the same time, carrying equal legal weight. The Neighbourhood Plan appears to of been ignored in the new draft version of the EDLP.

As required by the Localism Act, the Neighbourhood Plan is accorded with higher level planning policies. The Plan is concerned with land use and its policies to help inform future planning applications. Site Exmo _17 would never have been considered for development in the Neighbourhood plan and the idea of a large-scale housing development, goes against the views of the local community. Both East Devon County Council (EDDC) councillors and Clinton Devon Estates (the landowner) have not listened to the views of the community and appear to be pushing this development through. To have Bloor Homes , the potential house builder holding public consultations, when the new Local Plan has not been finalised and planning requests for screening opinion and EIA scoping request for the proposed development of up to 450 houses (was initially for 410 houses) on the planning portal demonstrates that the community views are not being listened to. When I attended the Bloor Homes event, the plan is to enhance the public open space, as well as the housing, employment land and a community hub. We already have an amazing space to walk, cycle and enjoy the open countryside. What is planned, will not enhance, but permanently destroy the National Landscape. Formally known as the Area of Outstanding Natural Beauty (AONB), it really is a beautiful area. The views are far reaching of the countryside, with its rural charm and is valued by the community as a place to get away for exercise and health and wellbeing. Exmo_17 is also near to and can be seen from the Southwest Coast Path, which is also part of the National Trail, called the King Charles III England Coast Path. It

is part of a legacy to be enjoyed by walkers. However, the far- and wide-reaching views from the SW coast path, will be ruined by this potential housing development. The National Planning Policy Framework (NPPF) talks of sustainable development which was agreed in the Neighbourhood plan. The BUAB for Exmouth was to contain the town's future planned development needs and to protect the open countryside outside the boundary from development. This is particularly relevant to Exmouth given the very special environment surrounding the town such as the National Landscape, Jurassic coast and the Estuary. Site Exmo_17 provides a much-valued green space of local amenity value. The site has the combined footpath and cycleway with countryside views and tranquillity freely available to the public. By protecting the site, it would also continue to ensure a much-needed wildlife corridor. It is of great importance to protect existing open spaces. Planning authorities have a responsibility to minimise impacts and provide net gains in biodiversity. Green corridors provide for wildlife movement in turn enhancing biodiversity, in effect bringing the joys of the countryside into the town. Site Exmo_17 already provides this and can continue to do this in the future if not developed. National Landscapes: areas legally designated as areas of outstanding natural beauty under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000.

In the National Landscapes briefing November 2024 there was discussion of Section 85 of the Countryside and Right of Way Act 2000 (CRoW Act), which was amended by the Levelling-up and Regeneration Act in December 2023. It requires relevant authorities, in exercising or performing any function that affect AONBs in England, to “seek to further the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty.” This is a statutory duty, which has been in force since December 26, 2023. The use of the word ‘duty’ in the legislation means that it is something all relevant authorities must do. The duty is considered to be a strengthening of the previous ‘duty of regard’ and seeks positive outcomes for the natural beauty, such as with National Landscapes. Within the planning context, relevant authorities are the Local Planning Authorities, the Planning Inspectorate and the Secretary of State, along with Parish Councils producing Neighbourhood Plans. The duty applies to all aspects of the development management process and the plan-making process such as planning application decisions, enforcement, and decisions relating to planning policies and site allocations in Local Plans. The duty is considered to require a pro-active approach by the decision-maker; relevant authorities are expected to be able to demonstrate that they have fulfilled the duty, and how compliance with the duty has been embedded in the plan-making and decision-making process. Natural England have advised that relevant authorities must take all reasonable steps to explore how the statutory purposes of the Protected Landscape can be furthered. The duty applies to plan-making and decision-making in relation to, or so as to affect, land in National Landscapes, not

only in considering proposals within a National Landscape, but also for affecting its setting. It is important to ensure that ‘to conserve and enhance’ is a priority in every relevant decision. The statutory duty needs to be considered in tandem with the National Planning Policy Framework (NPPF), in particular paragraphs 11, 182 and 183. Paragraph 182 of the NPPF (2023) sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in national Landscapes, whereas conservation and enhancement of wildlife and cultural heritage are important considerations. However, it is important to remember that natural beauty is not just the look of the landscape, but includes landform and geology, plants and animals, landscape features, and the rich history of human settlement over the centuries. It includes landscape and scenic quality and natural heritage such as species, habitats, geology and physical such as wildness, tranquillity and dark skies, and cultural heritage (including cultural traditions and the historic and other built environment that makes the area unique). (Levelling-up and Regeneration Act 2023 section 245; Countryside and Rights of Way Act 2000 section 85). Natural England (2023) states enhanced duty in relation to Protected Landscapes refers to National Landscapes (AONBs) and National Parks. Natural England’s Planning policies and decisions must also reflect relevant international obligations and statutory requirements. Historic England make clear that the historic environment is fundamental to the distinctive character, sense of place and natural beauty of each National Landscape. It is the conservation and enhancement of all this natural beauty (usually defined in the specific statutory AONB Management Plan) that is the primary purpose of designation, and that Local Planning Authorities must consider in discharging their duty under CRoW Act (2000) s.85. LPAs are advised to ensure internal Local Authority legal teams are aware of the s.85 duty. Use of the relevant AONB Management Plan • The Management Plan, which is a statutory document, which will have been adopted by the Local Authority and which formulates their policy for the management of the area and for the carrying out of their functions in relation to it. It is the key principle for ensuring that the statutory purposes of the National Landscapes are met, and is a material consideration in the planning process. Conserving and enhancing the natural beauty of the specific National Landscape will mean conserving and enhancing the character components or special qualities identified in the Management Plan; supporting the Management Plan Objectives, Policies and/or Principles as set out for each of these; and following any Management Plan actions set out for each. Local Planning Authorities must be able to demonstrate that they have complied with the strengthened duty in any decision or action that impacts or could potentially impact on the National Landscape. To demonstrate that they have sought to further the purpose of designation in making decisions regarding planning policies, site allocations, and development management (including planning enforcement), it is considered LPAs will need to; establish the facts about the natural beauty of the area, especially with reference to the statutory Management Plan for the specific National Landscape; identify what comprises the natural beauty, using

descriptions of natural beauty, including Statements of Significance, description of key characteristics and special qualities, as set out in National Landscape Management Plans; and the natural beauty criteria (Natural England (2017) Areas of outstanding natural beauty: designation and management; Natural England (2021) Guidance for assessing landscapes for designation as National Park or AONB in England). The duty to seek to further the purpose of conserving and enhancing the natural beauty of National Landscapes applies to the full range of aspects of the plan-making process. An LPA will need to be able to demonstrate how it has, throughout all stages of the preparation of the Local Plan, sought to further the purpose of conserving and enhancing the natural beauty of the National Landscape. This includes at examination stage, addressing the s. 85 duty actively in responses to Inspector's Findings and in any proposed modifications to Local Plans including consideration of Neighbourhood Plans and to ensure the overall vision and development strategy would align with the objectives/principles/policies of the relevant National Landscape Management Plan. To identify how much of a district's objectively assessed need can be met without harming the natural beauty of the relevant National Landscape, particularly where meeting the need would require allocations that would not further the purposes of National Landscape designation which may involve setting a lower Local Plan housing requirement figure. If a draft planning policy would not align with the duty to seek to further the applicable legislative purpose (e.g. if it would conflict with any of the Management Plan's objectives/principles/policies), then consider amending the policy such that you could confidently say the decision does seek to further the relevant purpose. For decisions relating to site allocations assess what impact the proposed site allocation would have on the natural beauty of the National Landscape, considering its scale, location and landscape setting with reference to the character components/special qualities set out in the National Landscape Management Plan. (In this regard, consider including a specific criterion regarding 'natural beauty' within the Strategic Housing Land Availability Assessment (SHLAA)/Housing and Economic Land Availability Assessment (HELAA), and within the Sustainability Appraisal). Consider how the natural beauty of the National Landscape might be affected, were the site to be allocated for development. Remember to consider the holistic concept of natural beauty. Consider whether this would cause harm to the natural beauty of the National Landscape. Consider the objectives/principles/policies of the National Landscape Management Plan. Natural England have advised that the strengthened duty underlines the importance of avoiding harm to the statutory purposes of Protected Landscapes. Ensure clear differentiation between any proposed measures that seek to mitigate or compensate for harm (e.g., like-for-like replacement), and those that further the conservation and enhancement of the natural beauty of the National Landscape. Natural England have advised that measures that further the purposes are required in addition to mitigation. If the measures would have a neutral effect, consider what modifications would help further the purpose of conserving and enhancing the natural

beauty. If promoting a site allocation would not align with the duty to seek to further the conservation and enhancement of natural beauty, then consider amending or deleting a site allocation such that you could confidently say the decision does seek to further the statutory purpose. (For example, choosing not to allocate a particular site within or close to the National Landscape boundary could demonstrate compliance, where this results in avoiding harm.) Evidence how the LPA has sought to further the purpose of conserving and enhancing the National Landscape in its decision, with reference to aligning with National Landscape Management Plan objectives/principles/policies. Natural England (2023). The duty to seek to further the purpose of conserving and enhancing the natural beauty of National Landscapes applies to the full range of development management decision-making, including considering applications for outline, full and reserved matters, listed building consent, applications for works to protected trees, and prior notifications, along with enforcement work on planning breaches. An LPA should also ensure that local validation checklists require the submission of sufficient, specific information to enable them to fulfil the s.85 duty in their decision-making. For decisions relating to planning applications, assess what impact the proposal would have on the purpose of designation; consider how the natural beauty of the area might be affected, were the proposal to go ahead how the proposal would align with the National Landscape Management Plan objectives/principles/policies. Consider whether this would cause harm to the natural beauty of the area. Natural England have advised that the strengthened duty underlines the importance of avoiding harm to the statutory purposes of Protected Landscapes. Where harm is identified, enhancements themselves, including biodiversity net gain (BNG) provision, are unlikely to be sufficient to align with the duty, which has the dual consideration of conserving and enhancing natural beauty. Also, ensure that any 'enhancements' within the proposal do genuinely align with, and help deliver, the objectives, principles and/or policies and resulting actions of the specific National Landscape Management Plan, by way of scope and location. Natural England have advised that the proposed measures should align with and help to deliver the aims and objectives of the designated landscape's statutory Management Plan. Ensure a clear differentiation between any proposed measures that seek to mitigate or compensate for harm (e.g. like-for-like replacement), and those that further the conservation and enhancement of the natural beauty of the National Landscape. Natural England have advised that measures that further the purposes are required in addition to mitigation. If the measures would have a neutral effect, consider what amendments would help further the purpose of conserving and enhancing the natural beauty. Could any conditions attached to any permissions help to conserve and enhance the natural beauty? As part of this assessment, consider the degree to which the effect on natural beauty has been articulated by the applicant (e.g. through LVIA's, heritage statements, ecology and arboriculture assessments, lighting statements and transport assessments); scrutinise the submission against the Management Plan in this regard. If

supporting an application would not align with the duty to seek to further the conservation and enhancement of natural beauty, then consider seeking amendments or refusing permission, such that you could confidently say the decision does seek to further the statutory purpose. Evidence how the LPA has sought to further the purpose of conserving and enhancing the National Landscape in its intended decision, with reference to aligning with the National Landscape Management Plan objectives/principles/policies. It is recommended that this evidence is referenced in officer reports/committee reports. N.B. Consultation on planning applications with the relevant National Landscape team by a Local Planning Authority does not in itself constitute compliance with the strengthened duty. It is the responsibility of relevant authorities themselves to comply with the duty, and to assess and record how they have complied with the duty, in exercising or performing any functions affecting a National Landscape. For applications to make a tree preservation order (TPO), or when assessing applications for works to protected trees (those with a TPO or in a Conservation Area), actively consider the s.85 duty by ensuring the impact on the natural beauty of the National Landscape forms part of the assessment of ‘amenity’ when considering whether to make a TPO; and when making decisions on applications for works to protected trees, ensure the impact on the natural beauty of the National Landscape forms part of the assessment of the amenity value of the tree or woodland and the likely impact of the proposal on the amenity of the area. S.84 of the CRoW Act (2000) sets out that LPAs have power “to take all such action as appears to them expedient for the accomplishment of the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, or so much of it as is included in their area”. Assess if the planning harms the natural beauty of the National Landscape, with regard to the Management Plan Statement of Significance and objectives, principles and/or policies. Consider if any amendments could help further the purpose of conserving and enhancing the natural beauty. Ensure clear differentiation between any proposed measures that seek to mitigate or compensate for harm (e.g., like-for-like replacement), and those that further the purpose of conserving and enhancing the natural beauty of the National Landscape. Natural England have advised that measures that further the purposes are required in addition to mitigation. The housing and economic land availability assessment does not determine whether a site should be allocated for development, but it’s up to the development plan itself to determine which of those sites are the most suitable to meet those requirements. It appears that the EDDC are using our National Landscape to meet housing targets when brownfield sites have been allowed by the planner to build inappropriate housing. Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other

protected areas). Neighbourhood planning bodies may use the method set out in this guidance to assess sites but any assessment needs to be proportionate to the nature of the plan. Neighbourhood planning bodies may also make use of existing site assessments prepared by the local planning authority as a starting point when identifying sites to allocate. The East Devon planning guidance for National Landscapes states that they are Nationally designated protected landscapes. Receives the highest level of protection under the National Planning policy unique and special area. Development proposals in and affecting the national landscape must have a regard to the conservation and enhancement of its natural beauty. Give great weight to conserving and enhancing the landscape and scenic beauty of the area in order to be in conformity with the national planning policy framework. National landscapes are becoming attractive, profitable places for housing and development. Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas). Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas). Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas). National Planning Policy Framework Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects; strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless the application of policies in this framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. For decision-taking this means, not approving development proposals in protected

areas of particular importance such as National Landscapes and provides a strong reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development such as housing to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. As established through statements of common ground (see paragraph 28) the policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park or defined as Heritage Coast; irreplaceable habitats; designated heritage assets and areas at risk of flooding or coastal change. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities. Clinton Devon Estates (CDE) wildlife vision to embed wildlife improvement into all business activities and hand onto future generations a countryside more diverse, resilient, functional and ecologically valuable than we have today. CDE Strategy 2030 doing today what is right for tomorrow. Development proactive approach will be taken to identifying appropriate opportunities to provide homes and business premises for local people with sustainability at the forefront of decision making. Net zero carbon emissions by 2030. Agriculture farming models should provide products customers want to buy, enhance our soils and natural environment and provide viable business models which wildlife can flourish. Increase woodland cover. Enhancing soils and natural environment. The Rt hon Steve Reed 16th December 2024 protected landscapes to be strengthened with new legislation and guidance to protect nature. This move comes amid the Government's push to promote access to nature, as part of the wider Plan for Change. New powers are to be granted to the country's iconic National Parks

and National Landscapes to boost nature's recovery and access to the outdoors. New legislation and guidance will give National Parks and National Landscapes a clear mandate to widen the public's access to nature through strengthened purposes and make changes to improve their governance that will allow for greater innovation and collaboration to prepare them for the future. The changes announced will see more trees planted, more peat restored and more habitat created, supporting Protected Landscapes to play a leading role in meeting Net Zero, Environment Act targets and the commitment to protect 30% of land for nature by 2030 as part of our Plan for Change. Covering a quarter of England's land area, improving the state of nature in our National Parks and Landscapes is vital to the health of our ecosystems. Our Protected Landscapes are home to nationally important habitats and our most iconic species – yet many are in a poor condition with the wildlife that lives within their boundaries in steep decline and the waterways that give many of these landscapes their magic now sadly polluted. The measures will include a general power of competence for National Park Authorities, which will clarify their legal framework, removing restrictions which prevent an entrepreneurial approach, and cutting through bureaucracy to remove barriers to achieving more for people and nature. The package will also strengthen the role that public bodies, including water companies, must play in delivering better outcomes for nature, water, climate and access to nature in these special places, through new regulation that will support public bodies and Protected Landscape organisations to work more closely together. Refining the purpose and powers of National Parks and National Landscapes will promote access to nature for the millions of people who visit these iconic landscapes each year, helping them to support a thriving rural economy and enable people to reap the benefits of spending time in greener and wilder places. These changes will empower Protected Landscapes to deliver more for nature and tackle climate change over the next 75 years and beyond. This reflects their vital importance to the nation – from protecting us from flooding, to celebrating our heritage and restoring our health and wellbeing. It's seventy-five years since our National Parks and National Landscapes were created, and they have done incredible work protecting some of our most treasured and beautiful landscapes. But so much of our countryside and wildlife is in decline so we must do more to protect it. To mark this anniversary the Government will introduce new laws to boost protections for the natural world, strengthen our National Parks and National Landscapes and increase opportunities for millions of people to enjoy the great outdoors. As an immediate step, new guidance is being published today that will help public bodies work together to make these special places greener, wilder and more accessible. Natural England Chair Tony Juniper said The 1949 National Parks Act laid the foundations for modern nature conservation, enshrining in law the means to protect dozens of exceptional landscapes and thousands of our best wild places while bringing joy to millions of people across multiple generations. Despite the achievements, however, these legal protections have not been sufficient to prevent Nature's continuing decline. And whereas in decades past

the challenge was about conservation, today we must not only hang on to what is left, but to also invest in Nature's recovery. Our countryside and green spaces are a source of great national pride, and government's commitment to delivering on nature, increasing access, planting three new National Forests, creating nine new National River Walks and empowering communities to create new parks and green spaces in their communities with a new Community Right to Buy. This Government is committed to restoring nature across the country, which is why we have wasted no time in announcing a rapid review of the Environmental Improvement Plan, which thriving Protected Landscapes will be essential to delivering. This will set out pathways to clean up our waterways, reduce waste across the economy, plant millions more trees, improve air quality and halt the decline in species by 2030. A healthy natural environment is crucial to the nation's health and prosperity, which is why nature recovery is an integral part of the Governments Plan for Change to create a decade of national renewal. Protected Landscapes – the collective term for National Parks and National Landscapes – range from lowland landscapes, such as the Cotswolds and the Norfolk Coast, to uplands such as the North Pennines and the Lake District. Protected Landscapes contain half of England's priority habits and Sites of Special Scientific Interest, 60% of deep peat and around 88% of heather and acid grassland habitats. Restoring our Protected Landscapes will be essential to protecting 30% of the UK's land and sea by 2030. Protected Landscapes' refers to National Parks, the Norfolk and Suffolk Broads and National Landscapes in England. National Landscapes' is the rebranded name for areas of outstanding natural beauty (AONBs). This name change is not statutory. The Protected Landscapes duty guidance sets out how the Protected Landscapes duty is intended to operate and provides broad principles to guide relevant authorities in complying with it. Relevant authorities must now 'seek to further' the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes. The duty is intended to facilitate better outcomes for England's Protected Landscapes, which are in line with their statutory purposes. The duty does not prevent relevant authorities from undertaking their statutory functions and discharging their legal duties and other responsibilities.

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Full name: Lawrence Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I writing to raise my concerns that there are major planning and legal issues regarding the inclusion of EXMO_17 site within the local plan and promoting such large scale development within the National Landscape, which also used to be part of the Coastal Presevation Zone. The change to the Coastal Preservation Zone boundary is another example of where the council ride rough shode over public opinion and the wishes of local residents. The inclusion of EXMO_17 within the plan is in direct contradiction of chapter 12 of the plan and in contradiction of the National Planning Policy Framework. The council members have also rejected other sites on landscape and AONB grounds and completely ignored those same grounds when considering EXMO_17. I attach a document I put together for the regulation 18 consultation detailing why EXMO_17 should not be in the local plan.

Full name: Chrissie Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: As required by the Localism Act, the Neighbourhood Plan is accorded with higher level planning policies. The Plan is concerned with land use and its policies to help inform future planning applications. Site Exmo _17 would never have been considered for development in the Neighbourhood plan and the idea of a large-scale housing development, goes against the views of the local community. What is planned, will not enhance, but permanently destroy the National Landscape. Formally known as the Area of Outstanding Natural Beauty (AONB), it really is a beautiful area. The views are far reaching of the countryside, with its rural charm and is valued by the community as a place to get away for exercise and health and wellbeing. Exmo_17 is also near to and can be seen from the Southwest Coast Path, which is also part of the National Trail, called the King Charles III England Coast Path. It is part of a legacy to be enjoyed by walkers. However, the far- and wide-reaching views from the SW coast path, will be ruined by this potential housing development. The National Planning Policy Framework (NPPF) talks of sustainable development which was agreed in the Neighbourhood plan. The BUAB for Exmouth was to contain the town's future planned development needs and to protect the open countryside outside the boundary from development. This is particularly relevant to Exmouth given the very special environment surrounding the town such as the National Landscape, Jurassic coast and the Estuary.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of EXMO_17 from the plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The inclusion of EXMO_17 is not sound, it is not justified nor is it consistent with National Policy. National Landscapes: areas legally designated as areas of outstanding natural beauty under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000.

In the National Landscapes briefing November 2024 there was discussion of Section 85 of the Countryside and Right of Way Act 2000 (CRoW Act), which was amended by the Levelling-up and Regeneration Act in December 2023. It requires relevant authorities, in exercising or performing any function that affect AONBs in England, to “seek to further the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty.” This is a statutory duty, which has been in force since December 26, 2023.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of EXMO_17 from the plan and future protection of all areas of National Landscapes.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The inclusion of EXMO_17 is contrary to the Exmouth Neighbourhood plan and goes beyond the Built up area boundary (BUAB).

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Chrissie Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: I

believe that the proposed development of site EXMO_17, will mean an extension of Exmouth on the currently undeveloped East Devon National Landscape (formerly AONB) towards Budleigh Salterton. This would open the door that no protected landscape will be safe, despite the increase in protection of National Landscapes which has been outlined by the Mp Steve Reed. Inclusion of EXMO_17 in the EDDC Local Plan fails the consistency with national policy soundness test due to severe conflicts with statutory protections, national planning policy, and local policy obligations.

1. Direct Conflict with National Planning Policy Framework (NPPF) The National Planning Policy Framework (NPPF) provides unequivocal legal protection for National Landscapes: Paragraph 176: The highest level of protection must be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Development should be strictly limited in these areas. The proposed extension fundamentally contradicts this principle, as it represents large-scale urban encroachment into a protected landscape. Paragraph 177: Major development in a National Landscape should be refused unless it passes exceptional circumstances tests and is in the public interest. This proposal fails every test: No overriding need: Housing or economic growth objectives do not constitute exceptional circumstances, particularly when alternative sites exist outside protected areas. Alternative locations exist: Other areas within East Devon can accommodate growth without violating protected land status. Severe environmental and landscape harm: The development irreversibly damages the area's ecological integrity, scenic character, and ecosystem services. Legal Precedent: High Court rulings have consistently upheld AONB/National Landscape protections, ruling

that economic development or housing targets do not override statutory protection. The approval of this proposal would invite an immediate legal challenge.

2. Breach of Statutory Duty Under the Countryside and Rights of Way Act 2000 (CROW Act, Section 85) Section 85 of the CROW Act places a mandatory legal duty on public authorities to conserve and enhance the natural beauty of National Landscapes. Any decision that fails to give great weight to protection is unlawful. By approving this proposal, East Devon District Council would be in breach of this duty, making the plan legally indefensible and subject to judicial review.

3. Direct Contradiction of the East Devon Local Plan and Policy Framework The proposed extension also fails to comply with East Devon's own planning policies, making it internally inconsistent and thus unsound: Strategy 46: Landscape Conservation and Enhancement and AONBs Requires that development must enhance, not harm, the special qualities of National Landscapes. The proposal would cause irreversible harm, violating this policy outright. Policy D1: Design and Local Distinctiveness Development must respect and protect local landscape character. The urban expansion into protected countryside undermines the distinctive rural and coastal identity of Budleigh Salterton and its surroundings. Urban Sprawl Prevention & Settlement Separation The merging of Exmouth and Budleigh Salterton is a serious planning concern. National and local policy explicitly protect the distinctiveness of settlements, ensuring they are not lost to uncontrolled expansion.

4. Environmental Destruction and Irreversible Harm The East Devon National Landscape is one of the most ecologically valuable and visually iconic landscapes in the UK. Development would result in: Biodiversity loss: This area hosts legally protected species and priority habitats under the Wildlife and Countryside Act 1981 and the UK Biodiversity Action Plan. Destruction of irreplaceable ecosystems: The undeveloped land acts as a natural carbon sink, floodplain, and wildlife corridor. Increased climate risk: Removing these natural defences increases flood risk, reduces climate resilience, and worsens ecological degradation.

5. Legal Risk of Judicial Review and Government Intervention This proposal is legally indefensible. If included in the Local Plan: It is highly likely to be legally challenged under the CROW Act and NPPF non-compliance. Past judicial reviews have struck down developments in National Landscapes where local authorities failed to provide a lawful justification. Conclusion: The Local Plan is Unsound and Legally Indefensible This proposal directly contradicts national policy, breaches statutory duties, violates East Devon's own Local Plan, and would likely be overturned in court. To remain legally compliant, policy-consistent, and defensible, East Devon District Council must exclude this proposal from the Local Plan.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See previous answer

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: If EDDC agree to develop this site, they will be in breach of the statutory legislation that is there to protect National Landscapes from development.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: As a local member of the community I also see myself as a ambassador for the national landscape and would like to be involved in pteirctimg this site Exmo_17 for future generations.

Full name: Lawrence Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The inclusion of EXMO_17 as a potential development site strongly contradicts the outstanding natural landscapes chapter of the plan. The inclusion of EXMO_17 is also against the National Planning Policy Framework paragraph 176 and 177. And can also be viewed as a breach of statutory duty under the CROW Act 2000 section 85.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove EXMO_17 as a potential development site from the plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The selection of EXMO_17 is not justified, identical arguments that could be used to rule-out EXMO_17 were used to discount other sites but we're not used for EXMO_17 for some reason. Examples are given towards the end of the attached pdf document.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: EDDC Should not

pursue development in EXMO_17 and it should be removed as a development area from the plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lawrence Hunn

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The inclusion of Land to the South of Littleham, (EXMO_17) is not legally compliant. The land highlighted for development is within the National Landscape (Formerly AONB) and therefore is a protected Landscape, both legally and within this very plan.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of EXMO_17 as a future development site.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The selection of EXMO_17 as a development site is not justified. Other potential development sites were rejected due to their potential impact on the landscape. EXMO_10 reasons for rejection included the open and exposed nature of the site in terms of the landscape and its rural rather than urban fringe character. Honiton04 rejected due to its high landscape impact and the site being within the AONB. Honiton12 rejected due to the impacts on landscape, heritage, ANOB and the adjoining grade 2* church. Exactly the same situation as EXMO_17. EXMO_17 is not justified, neither is it consistent with national policies relating to development in the National Landscape.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: EXMO_17 should be removed as a development site from the plan.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The inclusion of EXMO_17 does not demonstrate any thought of corporation, neither does it show any respect for environmental designations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Chrissie Hunn

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

8.3

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: There needs to be local legislation that defines what affordability is. No new housing is affordable when developers are trying to make a profit. Housing needs to be built for the community needs and not the wrong type of housing such as privately owned retirement flats on brownfield sites that could of been mixed use.

Stephanie Hunns

Full name: Stephanie Hunns

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strong object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns. Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner. A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Caroline Hunt

Full name: Caroline Hunt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Darren Hunt

Full name: Darren Hunt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible

town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Flora Hunter

Full name: Flora Hunter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy. ? Exmo_20 would destroy the “tranquillity, wildness and dark skies” of the countryside, which is contrary to POLICY OL01. ? Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9 ? The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality (East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04. ? Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE02. ? Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B. ? Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is

contrary to POLICY TR01. ? The main access point to Exmo_20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo_20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove Exmo_20 from the Local Plan

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Jessica Hunter

Full name: Jessica Hunter

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The development proposed at Exmo_20 could and should be located on an alternative site where it would cause less or no harm to the Pebblebed Heaths(SAC/SPA). Developing Exmo_20 is contrary to POLICY PB01 of the local plan and not in accordance with the mitigation strategy.

...Exmo_20 would destroy the “tranquility, wildness and dark skies” of the countryside, which is contrary to POLICY OL01.

...Developing Exmo_20 would fragment and isolate habitats and destroy wildlife corridors, contrary to PARAGRAPH 13.23 of the Local Plan. It would be detrimental to irreplaceable habitats, veteran trees and species rich hedgerows across the site, contrary to PARAGRAPH 13.9

....The Habitats Regulations assessment (30.01.25) confirms that there is “currently not sufficient certainty to rule out adverse effects in integrity in relation to...air quality(East Devon Pebblebed Heaths SAC/SPA). Exmo_20 is in conflict with POLICY OL09 and POLICY PB04.

...Exmo_20 would have significant adverse effects on St John in the Wilderness Grade II* listed church and churchyard, drastically altering the peaceful setting for worship which currently exists for the congregation. This is contrary to POLICY HE 02.

Exmo_20 is upstream of Exmouth on the main rainwater catchment area of Withycombe Brook, on a subsoil of heavy clay which makes soakaways ineffective. It would exacerbate the already identified flood risk through the lower lying land at the bottom of the site and through Withycombe. This is in conflict with POLICY AR01B.

...Exmo_20 would increase the need for car travel and increase traffic congestion, in conflict with PARAGRAPH 11.2. It is unsustainable development. It is isolated and people would need to travel much further than 800m to existing key services and facilities, contrary to PARAGRAPH 11.6. It is too far (and too steep) from any town centre for people to use walking or cycling as their choice of transport. This is contrary to POLICY TR01.

...The main access point to Exmo 20 is significantly closer to Budleigh Salterton than Exmouth, making Budleigh its most convenient and accessible town. The services and infrastructure of Budleigh (High Street, Doctor's, school, beach etc) would be the obvious choice for residents of Exmo 20. This would lead to coalescence of Budleigh and Exmouth, contrary to POLICY OL05 of the local Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Alison Hurst

Full name: Alison Hurst

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath.

We believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Full name: Alison Hurst

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: The policy was lawful

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I believe that the proposed development of site EXMO_17, which by its very nature will mean an extension of Exmouth eastward on the currently undeveloped East Devon National Landscape (formerly AONB) towards Budleigh Salterton. Inclusion of EXMO_17 in the East Devon District Council Local Plan fundamentally fails the "Consistent with national policy" soundness test due to severe conflicts with statutory protections, national planning policy, and local policy obligations.

1. Direct Conflict with National Planning Policy Framework (NPPF) The National Planning Policy Framework (NPPF) provides unequivocal legal protection for National Landscapes: Paragraph 176: The highest level of protection must be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Development should be strictly limited in these areas. The proposed extension fundamentally contradicts this principle, as it represents large-scale urban encroachment into a protected landscape. Paragraph 177: Major development in a National Landscape should be refused unless it passes exceptional circumstances tests and is in the public interest. This proposal fails every test: No overriding need: Housing or economic growth objectives do not constitute exceptional circumstances, particularly when alternative sites exist outside protected areas. Alternative locations exist: Other areas within East Devon can accommodate growth without violating protected land status. Severe environmental and landscape harm: The development irreversibly damages the area's

ecological integrity, scenic character, and ecosystem services. Legal Precedent: High Court rulings have consistently upheld AONB/National Landscape protections, ruling that "economic development" or "housing targets" do not override statutory protection. The approval of this proposal would invite an immediate legal challenge.

2. Breach of Statutory Duty Under the Countryside and Rights of Way Act 2000 (CROW Act, Section 85) Section 85 of the CROW Act places a mandatory legal duty on public authorities to conserve and enhance the natural beauty of National Landscapes. Any decision that fails to give "great weight" to protection is unlawful. By approving this proposal, East Devon District Council would be in breach of this duty, making the plan legally indefensible and subject to judicial review.

3. Direct Contradiction of the East Devon Local Plan and Policy Framework The proposed extension also fails to comply with East Devon's own planning policies, making it internally inconsistent and thus unsound: Strategy 46: Landscape Conservation and Enhancement and AONBs Requires that development must enhance, not harm, the special qualities of National Landscapes. The proposal would cause irreversible harm, violating this policy outright. Policy D1: Design and Local Distinctiveness Development must respect and protect local landscape character. The urban expansion into protected countryside undermines the distinctive rural and coastal identity of Budleigh Salterton and its surroundings. Urban Sprawl Prevention & Settlement Separation The merging of Exmouth and Budleigh Salterton is a serious planning concern. National and local policy explicitly protect the distinctiveness of settlements, ensuring they are not lost to uncontrolled expansion.

4. Environmental Destruction and Irreversible Harm The East Devon National Landscape is one of the most ecologically valuable and visually iconic landscapes in the UK. Development would result in: Biodiversity loss: This area hosts legally protected species and priority habitats under the Wildlife and Countryside Act 1981 and the UK Biodiversity Action Plan. Destruction of irreplaceable ecosystems: The undeveloped land acts as a natural carbon sink, floodplain, and wildlife corridor. Increased climate risk: Removing these natural defences increases flood risk, reduces climate resilience, and worsens ecological degradation.

5. Legal Risk of Judicial Review and Government Intervention This proposal is legally indefensible. If included in the Local Plan: It is highly likely to be legally challenged under the CROW Act and NPPF non-compliance. Past judicial reviews have struck down developments in National Landscapes where local authorities failed to provide a lawful justification. Conclusion: The Local Plan is Unsound and Legally Indefensible This proposal directly contradicts national policy, breaches statutory duties, violates East Devon's own Local Plan, and would likely be overturned in court. To remain legally compliant, policy-consistent, and defensible, East Devon District Council must exclude this proposal from the Local Plan.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

EDDC should not pursue development in EXMO_17 because they would breach planning law and ultimately would end up in years of litigation and that only Government had the power to change planning law, not EDDC

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

EDDC should not pursue development in EXMO_17 because they would breach planning law and ultimately would end up in years of litigation and that only Government had the power to change planning law, not EDDC

Chris Hurt

Full name: Chris Hurt

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: I strongly object to building on the farmland named Exmo_17. Until very recently it had two protections to prevent building: National Landscape and Coastal Preservation Area. EDDC consulted on whether the CPA protection should be removed. Hundreds of Exmouth residents said no, but despite this, EDDC voted to remove that protection. National Landscape is of equal importance to National Parks and should not have large scale building on it. If house building and light industry on Exmo_17 were allowed, it would take away the beauty that attracts visitors to the area: tourism that the town depends upon. It would also create a precedent that could destroy areas of National Landscape that surround East Devon's coastal towns.

Based on local building projects in recent times, we cannot be certain either that the 'affordable' homes will be in the reach of people on low incomes or that the number of such homes promised by the developer will actually materialise. The proposal to build industrial units next to the main road, the entranceway to the town from the East, is incongruous. It would make much more sense to add them to the trading estate on the opposite side of the road, which is owned by the same landowner.

A further fault with this location is the fact the proposed access road has only one exit (onto the main road) and would go straight across the old railway line which is now a well-used wide cycle and footpath. Disruption of the traffic free cycle and footpath should not be allowed.

I believe that to destroy this beautiful landscape would be sheer folly, depriving both present and future generations of enjoyment and wellbeing. It would not be in the public interest of Exmouth to allow building on Exmo_17.

Rachel A Hyde

Full name: Rachel A Hyde

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The main access point of Exmo_20 is closer to Budleigh Salterton than Exmouth and the town is already overstretched with an existing need for more doctors, dentists, buses etc. In addition this would lead to the two towns forming a conurbation contrary to POLICY OL05. It would also disturb and probably decimate nature, harm the historic site of St John in the Wilderness and create a flood risk along the Withycomb Brook. Any new site would also require its own shops, public transport and other amenities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Exmo_20 needs to be either considerably reduced or at least have its own amenities. Exmouth should be the town residents use rather than the much smaller Budleigh Salterton, and a lot more needs to be done to safeguard environmental and historical issues.