STOP EXMO20 · BRIEFING FOR COUNCILLORS · NOVEMBER 2026

EXMO20: nine reasons to take it out of the Local Plan

Allocation EXMO20 is about 700 homes on farmland at St John's, between Exmouth and Budleigh Salterton, next to the internationally protected Pebblebed Heaths. The Strategic Planning Committee meets on **1 December** and full Council on **9 December 2026**. Every quote below was said at a council meeting and links to that moment in the council's own recording.

1 Harm to the protected Heaths can't be ruled out

The council's own assessment can't rule out harm from traffic pollution. National policy and good practice favour avoiding harm first. Devon County Council puts 2,235 of the 2,536 extra vehicles a day on the B3179, beside the Heaths, down to EXMO20 (assuming its main access is from the B3179). Natural England says the plan "remains unsound until this uncertainty is resolved".

> *"specific sites where if they were removed the impacts would come below the thresholds that Natural England guidance suggests is acceptable"*
>
> Ed Freeman (officer), 22 September 2026, 03:11:05 · play the clip ▶ · about this meeting

2 It failed the council's own assessment

EXMO20 failed the HELAA site assessment. The officers' report of August 2024 recommended "No" to allocating it. Members added it on 3 September 2024, before the evidence on access, the Heaths and sewage was done.

> *"the allocated site failed the first HELAA assessment."*
>
> Ed Freeman (officer), 14 July 2026, 00:41:25 · play the clip ▶ · about this meeting

3 Alternatives weren't properly tested

The replacement figures officers gave members for EXMO20 were based on other Exmouth sites, although members had been told there was no target for Exmouth.

> *"There was no target set for Exmouth"*
>
> Cllr Olive (Chair), 29 October 2024, 02:46:08 · play the clip ▶ · about this meeting

4 Access and sewage have not been shown to work

The main road access has to cross the 400 m protection zone, and its route is not known. The Environment Agency says the water evidence doesn't yet show the growth "can be delivered sustainably".

> *"we don't know where the access road would come in from from the B3179"*
>
> Ed Freeman (officer), 2 September 2025, 01:46:35 · play the clip ▶ · about this meeting

5 Harm to a grade II* listed church

The church of St John in the Wilderness sits within the site. Historic England marked EXMO20 "Unsound" in both consultations, warning that development "could result in considerable harm" to the church's setting and that the access road could cause "significant harm".

> *"**St John in the Wilderness** Church which is a Grade II star-listed building that lies sort of at the heart of the site."*
>
> Ed Freeman (officer), 2 September 2025, 00:57:23 · play the clip ▶ · about this meeting

6 The plan met its requirement without the full 700 homes

The sites officers recommended in 2024, which included only a 150-home southern part of the site, already met the housing requirement, and the requirement has since fallen by 563 homes.

> *"we only have a headroom position of 1.2 or 253 dwellings"*
>
> Ed Freeman (officer), 3 September 2024, on the sites officers recommended, which included only a 150-home southern part of EXMO20, 00:13:35 · play the clip ▶ · about this meeting

7 "Significant change" has no published definition

EXMO20 is kept because removing it would be a "significant change", but we have found no published definition or threshold. Officers have said removing sites is possible.

> *"if we were taking out say a a site of only 10 houses in terms of the housing numbers it doesn't represent a massive problem because we gave ourselves headroom"*
>
> Ed Freeman (officer), 8 July 2025, 02:16:43 · play the clip ▶ · about this meeting

8 Evidence unfinished, consultation summarised by AI

The plan went to consultation with key evidence unfinished. About 1,110 and then 1,672 responses on EXMO20 were summarised with AI, checked by a "general sense check".

> *"we knew we didn't have the water cycle study we knew that the HRA required some some further work"*
>
> Ed Freeman (officer), 8 July 2025, 01:47:06 · play the clip ▶ · about this meeting

9 In committee members' own words

Members of the Strategic Planning Committee have themselves said EXMO20 shouldn't have been included.

> *"it shouldn't have been included at the time. The officers themselves said it shouldn't be included."*
>
> Cllr Ledger, 8 July 2025, 02:51:03 · play the clip ▶ · about this meeting

What we're asking

We ask the Strategic Planning Committee and full Council to remove EXMO20 from the East Devon Local Plan before it is submitted for examination. Natural England, the RSPB, Devon Wildlife Trust, Historic England and Budleigh Salterton Town Council have all raised serious concerns or objected, and EXMO20 drew more consultation responses than any other site.

The full evidence, with every document and recording linked: stopexmo20.co.uk/evidence · our answers to the council's arguments: stopexmo20.co.uk/answers · contact@stopexmo20.co.uk

Stop EXMO20 is run by local residents. Quotes come from machine transcripts of the council's YouTube recordings; please play the clip to hear the exact words. Ed Freeman is the council's Assistant Director, Planning Strategy and Development Services. This briefing is not legal advice.