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Lympstone Parish Council Response to East Devon Local Plan Consultation - Regulation 19

The EDDC latest stage Consultation seeks views on legal compliance, soundness, and the duty to cooperate. Lympstone Parish Council wishes to inform you of the following concerns:

Strategic Policy SP01: Spatial Strategy

Local Centre designation

This is of particular concern to our response. The Parish Council on behalf of residents, and residents individually have challenged this designation in consultations.

Lympstone has been designated a Local Centre, defined as “*settlements with reasonable population levels, and a smaller but important selection of strategic and local facilities*”. Lympstone accepts that it must under the new plan have some new development, and identified 4 proposed sites out of those put forward where development could take place and the village still retain its identity and Spirit of Place.

Lympstone has always questioned and challenged its designation as a Tier 3 settlement. The background evidence paper initially placed it in the village category (*see Appendix A*) but it was elevated to Tier 3 because of the train station. The train station has only 13 car parking spaces (*see photo 1 below*); bus services to Lympstone are limited, and do not carry passengers to the rail station, stopping instead at the Northern extremity of the village, a 20 minute walk to the train station (*see Appendix B*).

Photo 1: Lympstone Station Car Park with 13 car parking spaces



People will not walk from the outer fringes of the village to the station, nor is it possible to do so safely, as there are no pavements on our lanes (*see photos 2 and 3 below*).

The walking distance from the closest bus stop to Lympstone Village train station is 0.6 miles (source: Google Maps), and proposed developments are even further away.

Photo 2: Lack of pedestrian footway on Meeting Lane



Photo 3: Lack of pedestrian footway on Strawberry Hill



In all other respects, Lymstone is a small village of some 900 houses and 2,000 residents, with one shop, a cafe and 3 pubs.

Exton, the next village along the Avocet Railway Line, has a train station and similar amenities - shop, pub, village hall and church. It is also served by the same bus route as Lymstone but is not designated in the same tier. We question why the criteria used to place Lymstone as a Tier 3 settlement have not applied to Exton.

In addition to the justification of a railway station resulting in the tier placement and housing allocation, we feel it appropriate to draw your attention to the Avocet Line Railway Users Group assessment. This states that in order to meet the extra demands such expansion would bring, would necessitate longer trains and therefore increased platform lengths.

Can a plan be judged sound when such practicalities of its conclusions are glossed over?

As a Local Centre (Tier 3), Lympstone has a minimum housing requirement of 323, equivalent to a 36% increase in housing.

In comparison, Budleigh Salterton, with a population of 5,420 has a minimum housing requirement of 132; and the town of Sidmouth, with a population of 14,377 has a minimum housing requirement of 471. This undermines the categorisation and the basic philosophy of the plan, that of allocating sites to higher tier settlements. The criteria being used and applied by the Planning Team at EDDC seem illogical, especially when the larger town of Budleigh Salterton is tiered alongside Lympstone.

How can the new plan be seen to be fair, and the processes for the decisions reached on each placing and housing requirement be seen to be sound with these allocations? Lympstone has consistently challenged its categorisation as a Tier 3 settlement, as evidenced in our previous consultation responses and in initial discussions with EDDC planning team on a new neighbourhood plan where Angela King EDDC Planning Officer states she will feed our views back to her colleagues (*see Appendix C: EDDC first Regulation 18 consultation Lympstone 7-11-22 to 15-01-23*).

We request the following modification: Reinstate the Tier 4 categorisation for Lympstone in the hierarchy of settlements.

Strategic Policy SP05: Development inside Settlement boundaries

The settlement boundaries defined by the Policies Map have been changed both to the north and south of Lympstone's historic boundary. Lympstone's historic boundary is clearly marked by boundary stones and a long-held village tradition of 'Beating the Bounds' can be traced back to at least the nineteenth century. This change has been made without consultation or discussion.

These changes significantly impact the housing allocations of the plan and in determining the spatial strategy, the impact on neighbouring communities has not been considered.

Example A

Lymp_07 (Courtlands) is within Lympstone parish, on the Lympstone side of the green wedge, yet has been allocated to Exmouth. Lymp_07 should be allocated to Lympstone, for residential, commercial and recreational purposes.

This is of particular importance because its inclusion within the settlement boundaries of Exmouth totally overrides a previous Inspectorate decision at Public Enquiry that found, to prevent coalescence, a distance of 450m should separate the two communities. Even EDDC's early documentation referred to in our response at the first Strategic Planning Site selection

was changed to facilitate site selection (*Appendix D: Response for SPC meeting Lymp07.docx*).

How can this be sound practice?

Example B

During the Reg 18 consultation phase and subsequent site selection process, site GH/ED/72a was within Woodbury parish. This site was discounted for Woodbury because it did not meet the spatial policy requirements, being totally separate and distanced from Woodbury centre. Then the site was allocated for consideration. Lympstone Parish Council requested to be allowed to comment on this during the site selection process as the full impact of the development would be felt in Lympstone. The Strategic Planning Committee refused to allow this request. Now at Reg 19, the site has been allocated to Lympstone, without any prior notice or discussion.

Can this be regarded as sound when consultation on GH/ED/72a has been highly questionable to say the least and the subject of formal complaint (Stage 1 ref 657909870, Stage 2 complaint Iken ref 003227).

There is also a question whether the site selection complies with Nolan Principles and Rules: the land owner Mr S Parkes is a Woodbury Parish Councillor, which could indicate a conflict of interests. The site was discussed as part of Woodbury, put forward by Woodbury and allocated to Woodbury, but at this last Regulation 19 stage, is now in...Lympstone!

Strategic Policy TR01: Prioritising walking, wheeling, cycling and public transport.

Walking and wheeling as a priority is not possible safely in Lympstone where the roads are predominantly Devon lanes with no pavements, and the A376, which splits the parish in two. Bus services to Lympstone are limited, and do not carry passengers to the rail station.

The sustainability appraisal and site selection process which defines a sustainable location as being a 20 minute walk, does not take into account public safety i.e. no pavements on the majority of our roads.

(reference Appendix B, and photos 2 and 3 above).

Strategic Policy CC01: Climate Emergency

A transparent calculation of the carbon cost of development must be included, along with sustainable travel options, and measures to reduce car dependency quantified. Without these important elements, this policy is not based on solid evidence.

Strategic Policy CC02: Net-zero carbon development

The policy description contradicts the title. "*All developments will be required to demonstrate... that minimising the carbon footprint of the proposed development has informed the design and layout...*" Minimisation is not the same as net-zero.

Compliance with the National Planning Policy Framework (NPPF, revised 12 December 2024)

The plan does not enable the delivery of sustainable development in accordance with the NPPF, specifically paragraph 8, which defines three interdependent and mutually supportive objectives - economic, social and environmental.

8 a) an economic objective - “to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;”

The plan does not identify sufficient land of the right type in the right place, nor does it identify or coordinate the provision of infrastructure. All the development in Lympstone is proposed to be located on agricultural land, which will impact the local economy. No new transport connections or infrastructure improvements sufficient to support the increase in population are planned.

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

The Plan does not meet the social objective of ensuring a range of homes to meet needs. Lympstone parish requires 2-3 bedroom starter homes, ‘affordable’ for a young family on an average Devon salary, so that youngsters growing up in the area can remain here; as well as bungalows which meet the downsizing needs of our older population. The planning applications we have seen to date do not meet this housing requirement (3 bungalows are offered at GH/ED/72a).

Services are at capacity, Lympstone’s GP surgery is full, ECC secondary school in Exmouth is full, therefore secondary school students will have to travel to Exeter. The A376 is the only A road between Exeter and Exmouth. No new bus or road routes to Exeter are planned, nor any upgrade to carriage stock on the ALRUG railway line.

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

Biodiversity net gain improvements are not able to be fully met on development sites in Lympstone due to the high existing biodiversity value of the land. Waste and pollution will increase as there is no evidence of water quality risk assessments for any of the sites - despite water pollution being a critical issue in Lympstone which is located on the Exe Estuary, a SSSI and RAMSAR site. Water quality here in Lympstone is intrinsically linked to flood risk, biodiversity, human health, and the local economy (tourism and shellfish business in Lympstone).

Regulation 19 Consultation documentation

Throughout the entire process of the development of the new Local Plan, EDDC has used Commonplace Portal and Technology as their preferred method of consultation. They have also given the opportunity to respond directly by email or letter which has been appreciated as the Commonplace software is difficult to use and navigate. Residents have had difficulty using it and indeed a tutorial was posted on how to use it by a resident as the process was so

frustrating. Now we have reached the Regulation 19 stage it is once again the preferred method.

There are no clear settlement allocation maps within the PDF document. The new interactive Policies map is unclear, and difficult to understand. The use of coloured dotted and dashed areas makes it very difficult to visualise where housing allocations are proposed. It is not possible to search by settlement, parish or town, and the Green Wedge layer is the same colour as the Housing allocation. This is not a clear, transparent, or accessible means of consultation.

Even during the EDDC introductory webinar on 6th February 2025 when the consultation and its process was explained to Councillors, the member of the planning team demonstrating the interactive element had difficulty navigating it to show its layers.

If the chosen means of consultation throughout the process has been and continues to be so non user friendly, can the whole process really be judged as sound?

There have been concerns that the whole process of Consultation has just been a tick box exercise and site allocation rushed to ensure that the Plan could move ahead with the lower centrally imposed housing figures. While, of course, trying to achieve all the necessary processes is desirable to save having even more development and one which we think is generally supported, Parishes can be forgiven for questioning the consultation aim. Is the process to genuinely listen to concerns and address them in the policies and final adopted Plan, or to simply go through the required statutory stages?

In Conclusion:

We believe that the new plan, if adopted, has used unsound reasoning and logic and does not satisfactorily address several strategic policy points. The consultation process itself has been flawed in several aspects and most importantly because it enables Tier 1 targets 'higher levels of development' for Exmouth by classifying Lympstone as a Tier 3 settlement (Lympstone; 'moderate levels of development') changing settlement boundaries and early documentation in the process that did not recommend development to accommodate this (*Appendix E*).

Lympstone's Spirit of Place will cease as a result of the Tier placement imposed on us and Lympstone will become a suburb of Exmouth. This cannot be a legitimate or sound outcome for a new plan to shape our district and lives for the next twenty years.

Members of Lympstone Parish Council who are willing to attend the hearing in person are Cllr Lisa Staddon, Cllr Susie Culhane and Cllr Susan Francis.

Appendix A

Lympstone was categorised in the village category (see Appendix A) but it was elevated to Tier 3 because of the train station. See Evidence and Examination Library, document **GEV-001** - [Role and Functions of Settlements Report](#) V3 Final Draft for SPC 05.10.21

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- 1.9 The East Devon Local Plan 2013 to 2031⁶ spatial strategy for development comprises three tiers:
- a) 'West End' where significant housing and employment development is planned, comprising the developing new town of Cranbrook and other large sites at North of Blackhorse and Pinhoe.
 - b) Seven Towns that form focal points for development to serve their own needs and those of surrounding rural areas: Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton, and Sidmouth.
 - c) 15 Villages that offer a range of accessible services and facilities to meet the day-to-day needs of their residents and nearby rural areas, with reasonable public transport: Beer, Broadclyst, Clyst St Mary, Colyton, East Budleigh, Feniton, Kilmington, Lympstone, Musbury, Newton Poppleford, Sidbury, Uplyme, West Hill, Whimple, Woodbury.

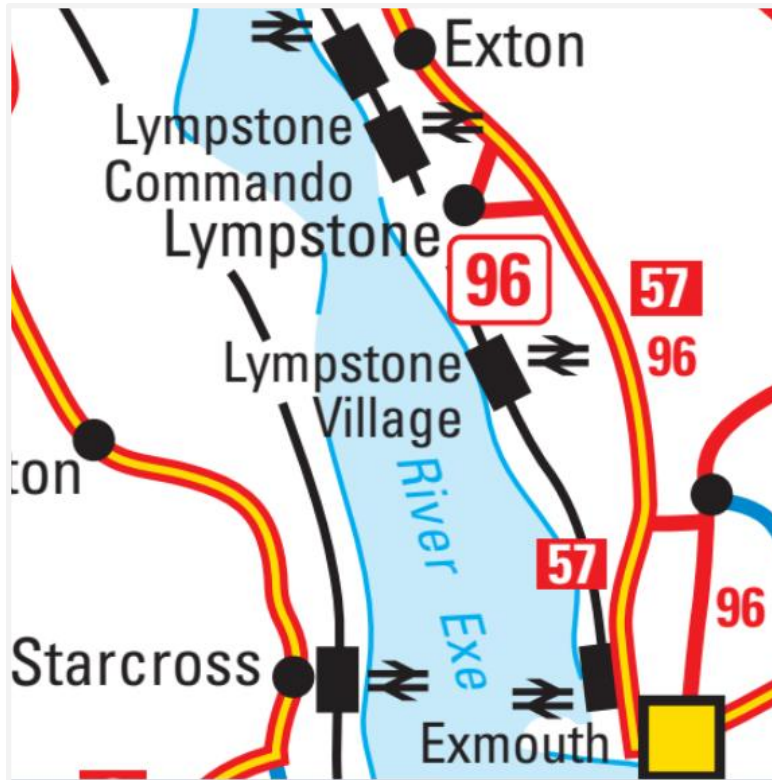
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- 3.37 Based upon the population and employment evidence, the following hierarchy of settlements are suggested:
- Tier one: Exmouth
 - Tier two: Honiton, Sidmouth
 - Tier three: Axminster, Seaton, Ottery St Mary, Cranbrook, Budleigh Salterton
 - Tier four: Clyst St Mary, Uplyme, Colyton, Beer, Broadclyst, Lympstone, Woodbury, Dunkeswell

Appendix B

Map of Bus routes 96 and 57 serving Lymington (bus stop = black circle)

(source: Devon County Council interactive bus map
<https://www.cartogold.co.uk/Devon/map.html#devon>)



Appendix C

Lympstone Parish Council Response to Draft East Devon Local Plan Regulation 18 consultation Lympstone 7-11-22 to 15-01-23

Lympstone Parish Council was first informed of the proposed East Devon Housing plan in January 2021 and were warned that space was required for 140 houses. We are now facing proposals that would see 350 houses built on first choice sites and another 150 on second choice sites in or around Lympstone Parish in the next 17 years. No reference is made to the current Lympstone Neighbourhood Plan which delivered more than its required housing numbers and expressed a preference for smaller infill sites. The Draft Local Plan appears to have reacted to offers from landowners for developments on agricultural land and does not consider the current infrastructure and restrictions for conserving the Green Wedge and the Coastal Preservation Scheme in this unique area of East Devon.

“East Devon District Council’s new Local Plan is woefully unimaginative because it just dumps most of the new homes in the west of the district. It isn’t a proper plan to help people stay in their communities, reduce travel to help the environment or keep families close together. This is less of a plan and more of a missed opportunity.” **Simon Jupp – MP East Devon.**

Lympstone is one of the places the new plan ‘dumps’ new development without regard to the wishes of its residents.

The draft plan is unimaginative – why can’t areas in the east of the district have some smaller developments planned in a similar way to HRH’s Poundbury vision. Why does all the development planned have to be in the west of the district? Why are our green spaces, green wedges, Coastal Preservation areas and our environment considered of less value than others and earmarked for development?

The plan says Lympstone “is considered a suitable location for low to moderate development level of growth”. This assertion seems to be driven by the draft Local Plan’s spatial strategy that groups settlements according to their amenities. Just because Lympstone has rail and bus links, three public houses (a fourth recently closed), a village store (saved some years ago by community effort), a branch surgery, plus small businesses of a café, hair salon and art gallery, it is deemed suitable for such a level of growth. It should be noted that the rail link is not ideal for commuting as planned developments would not be within walking distance and parking is extremely limited at the station and in the village centre. While Lympstone is lucky to have these amenities/businesses (many of which rely on visiting trade), by its characteristics and community Lympstone is a village not a small town. The plan glosses over/ignores that, to achieve this goal of growth, areas of green wedge, agricultural land and some coastal preservation areas will be lost, wildlife and the environment will be impacted. Current infrastructure will struggle to cope, including schools, GP’s, roads (especially the already over capacity A376), public transport, flooding, sewage and drainage.

Lympstone Parish Council held an open session in November 2022 to inform residents and invite their responses to the Draft Local Plan.

During our public session, the residents, when asked for their main considerations for giving a view on a proposed site, overwhelmingly listed:

- A376 already at capacity;
- Maintaining Green Wedges and Coastal Preservation areas;
- Access to proposed sites;
- Required Infrastructure;

- Flooding (please see supporting evidence from Lympstone Flood Resilience Group’s own report in the Annex at the end of this report.);
- Maintaining Exmouth / Lympstone gap – no coalescence.

86% of residents who took part in the consultation agreed the Draft Local Plan did not properly address the A376 already being at capacity and the required infrastructure for the scale of development it proposed.

The Built Up Area Boundary (BUAB) has been moved to accommodate the numbers of houses in the target figure which means in some cases, while houses are counted towards one area’s allocation, they impact another significantly more. Justification for the BUAB in the Draft Local Plan being moved/displaced are not explained properly and people did not understand why these do not correspond to Parish boundaries.

Our Parish is large and the map in the Draft Local Plan dealing with the ‘Lympstone’ sites does not include those in the outer reaches of our area and reflect the true impact the number of proposed dwellings will have. If approved coalescence will become almost inevitable and the strain on services and infrastructure intolerable and unsustainable.

Lympstone provided more than the required number of houses in the last round and no account has been taken of this in the present round.

Responses from the Public Consultations were collated and are summarised in the table below.

Reaction to proposed sites for Lympstone (values rounded to whole numbers – in descending order of opposition)

Site name and number of houses proposed by EDDC	YES %	NO %	No Preference Expressed or judged Possibly %
Lympstone 07 100 houses	7	86	7
Lympstone 08 14 houses	19	81	2
GH/ED/72 131 houses	19	79	2
Lympstone 10A 75 houses	14	79	7
Lympstone 09 54 houses	17	76	7
Lympstone 14 59 houses	31	60	10
GH/ED/73 46 houses	40	57	2
Lympstone 01 14 houses	43	48	10

GH/ED/75 6 houses	52	36	12
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Lympstone 07 Opposite Courtlands **100 houses**

- This site is a Second Choice one currently but, if approved for development, would be inside the new Exmouth BUAB with Lympstone again bearing the brunt of the strain on services and infrastructure.
- If developed, Lympstone would coalesce with Exmouth. This is something the residents and planning decisions have consistently opposed.
- This site had the highest opposition of 86% amongst residents from the Public Consultation. It has already been the subject of a Public Enquiry finding against development and, as recently as the end of 2022, a Planning Inspectorate Appeal found against development for just one house near the location listed due to main issue of desirability of maintaining the separation between Lympstone and Exmouth. Therefore, how can 100 even be considered?
- Courtlands Lane is mainly single track with no footways and if developed, the increased volume of traffic using it to access the village amenities would be dangerous.
- Farming land will be lost if built upon.
- Important areas of landscape and green wedge would be lost.

Lympstone 08 Land off Summer Lane **14 houses**

- This site is a Second Choice one currently but, if approved for development, would be inside the new Exmouth BUAB with Lympstone again bearing the brunt of the strain on services and infrastructure.
- The site currently forms part of the green wedge land and, if developed, coalescence is again probable.
- Summer Lane is mostly single track and access difficulties are a strong consideration.
- During the Public Consultation this site received the second highest percentage of 81% opposition from those who took part.

GH/ED/72 Fields to the north of Meeting Lane and west of Nutwell Road **131 houses.**

- This site is in Woodbury Parish but, if it is adopted, will impact Lympstone far more. Woodbury PC passed a motion to pass CIL money to Lympstone if this development is built but this intention could be rescinded and there is no regulation in place to ensure payment would happen.
- As this development would sit in Woodbury Parish, precepts would pass to Woodbury and this is unacceptable as all the strain falls upon Lympstone. Lympstone's services and infrastructure would be unfairly strained if the site proceeded.
- This site had the third highest opposition of 79% from the Public Consultation.
- Flooding is a consideration here with sloping land and will have to be managed.
- The junction at Meeting Lane onto A376 is totally unsuited to the increase in volume of traffic any development would create.
- Even when asked if development took place on this site and it guaranteed provision of sports facilities and the dangerous junction accessing the A376 addressed, 60% still opposed development here and in GD/ED/73.
- Heading south on the A376 this site is clearly visible. 131 houses will completely scar the rural landscape, impact the approach to Lympstone and change the character of the north side of

the village (as referred to in historic documents covering Nutwell Court and Gulliford Farm).

- Farming land will be lost and the Coastal Preservation area built upon.

Lympstone 10A Land off Upper Hulham Road **75 houses**

- This site is within our Parish but distanced from the 'village centre' and within the green wedge.
- If developed, the site would be isolated from village services and amenities. Residents would be forced to use vehicles for access to work, schools, shops and health services.
- It would also be within the new Exmouth BUAB and if developed again coalescence is probable.
- Hulham Road leads traffic from Exmouth towards the historic pebble bed heaths and Woodbury Common. It passes a number of ancient trees and woodland copses and plans to build in this area of outstanding beauty would be a travesty. Likewise, the approach towards Exmouth the beautiful views experienced coming across Woodbury Common would be negated by the proposed development.
- The increased traffic on the Hulham Road, if development took place, would again add strain on and overload the already at-capacity routes.
- Wotton Lane and Summer Lane are single track roads with limited passing places and no footways. Traffic is already using these unsuitable roads to access the A376 and at peak times both roads are congested and dangerous. In particular Wotton Lane as it accesses St Peter's School at drop off and pick up times.
- This site received joint third highest opposition of 79% from our consultation demonstrating how much residents value the green spaces separating Lympstone from Exmouth, especially now the Goodmores Farm development is underway.
- This site is considered unsuitable by Lympstone Flood Resilience Group as water run-off may cause flooding lower down the Wotton Brook in the village. See supporting evidence from their own report in the Annex at the end of this report.

Lympstone 09 Junction of Estuary View Hulham Road **54 houses**

- This site is within our Parish but distanced from the 'village centre' and within the green wedge.
- If developed, the site would be isolated from village services and amenities. Residents would be forced to use vehicles for access to work, schools, shops and health services.
- Hulham Road leads traffic from Exmouth towards the historic pebble bed heaths and Woodbury Common. It passes a number of ancient trees and copses and plans to build in this area of outstanding beauty would be a travesty. Likewise, the approach towards Exmouth the beautiful views experienced coming across Woodbury Common would be negated by the proposed development.
- It would also be within the new Exmouth BUAB and if developed again coalescence is probable.
- The increased traffic on the Hulham Road, if development took place, would again add strain on and overload the already at capacity routes.
- Wotton Lane and Summer Lane are single track roads with limited passing places and no footways. Traffic is already using these unsuitable roads to access the A376 and at peak times both roads are congested and dangerous. In particular Wotton Lane as it accesses St Peter's School at drop-off and pick-up times.
- This site received fourth highest opposition of 76% from Public Consultation demonstrating how much residents value the green spaces separating us from Exmouth especially now the Goodmores Farm development is underway.
- This site is considered unsuitable by Lympstone Flood Resilience Group as water run-off may

cause flooding lower down the Wotton Brook in the village. See supporting evidence from their own report in the Annex at the end of this report.

Lympstone 14 Land behind Kings Garden Centre **59 houses**

- This site is within our Parish but distanced from the 'village centre' and within the green wedge.
- If developed, the site would be isolated from village services and amenities. Residents would be forced to use vehicles for access to work, schools, shops and health services.
- It would also be within the new Exmouth BUAB and if developed, again coalescence is probable.
- The increased traffic on the Hulham Road if development took place would again add strain on and overload the already at capacity routes.
- Wotton Lane and Summer Lane are single track roads with limited passing places and no footways. Traffic is already using these unsuitable roads to access the A376 and at peak times both roads are congested and dangerous. In particular Wotton Lane as it accesses St Peter's School at drop-off and pick-up times.
- This site received the fifth highest opposition of 60% from the Public Consultation demonstrating how much residents value the green spaces separating us from Exmouth especially now the Goodmores Farm development is underway.
- Important areas of landscape and visual amenity will be lost.
- This site is considered unsuitable by Lympstone Flood Resilience Group as water run-off may cause flooding lower down the Wotton Brook in the village. See supporting evidence from their own report in the Annex at the end of this report.

GH/ED/73 Fields between Meeting Lane and Strawberry Hill **46 houses**

- This site received a 57% against to 40% for split from the Public Consultation.
- A proportion of residents accepted that some development was inevitable and reluctantly thought it a possible site.
- However, the site does have some major disadvantages. It is in the green wedge next to the BUAB.
- Flooding is a consideration here with sloping land and has to be managed.
- The junction at Meeting Lane onto A376 is totally unsuited to the increase in volume of traffic any development would create.
- Even when asked if development took place on this site and it guaranteed provision of sports facilities and the dangerous junction accessing the A376 addressed, 60% still opposed development here and in GD/ED/72.
- Farming land will be lost and the Coastal Preservation area built upon.
- Important areas of landscape and visual amenity will be lost.

Lympstone 01 Land to the rear of 22 Underhill Crescent **14 houses**

- This site received a 48% against to 43% for split from the Public Consultation.
- A proportion of residents accepted that some development was inevitable and reluctantly thought it a possible site.
- The site is in the green wedge but it is close to all the village amenities.
- The site is for a small number of dwellings which our Neighbourhood Plan and residents prefer.

GH/ED/75 Rear of Grange Close **6 houses**

- This site was the only one from the Public Consultation that received a majority of 52% in

favour of development.

- A proportion of residents accepted that some development was inevitable and reluctantly thought it a possible site.
- It is next to the BUAB and close to the existing road but gaining access to it would be difficult but it is close to all the village amenities.
- The site is also for a small number of dwellings which our Neighbourhood Plan and residents prefer.

Exmouth 04 land at Marley Drive Lypstone 70 houses

- Part of this site is in Lypstone Parish and designated 'red' on the maps as rejected for development. However, on the notes part of the site may be considered a second-best choice noting site constraints.
- As this was designated a rejected site it was not included in our Public Consultation but residents present at the Parish Council's presentation of their draft response to the East Devon Local Plan raised a number of concerns.
- The site is very close to pebble bed heaths, has ancient trees and would destroy habitat for wildlife.
- If developed, the site would be isolated from village services and amenities. Residents would be forced to use vehicles for access to work, schools, shops and health services.
- Access would be off Marley Drive which would create further traffic problems on Dinan way and Hulham Road.

Conclusions:

The Draft East Devon Local Plan is flawed from the outset in its concepts. There is support for plan Objectives 1, 2, 3, 7, 8, 9, 10, and 11. These reinforce the 'green agenda' and promote health and well-being in our community, and in particular Objective 10 Connections and Infrastructure and Objective 11 Supporting and Sustaining Thriving Villages are completely at odds with the plans for up to 500 new houses.

The plan does not address the impact such a large number of houses would have on the existing infrastructure and services: A376 + local roads, flooding drainage, health services, schools and work opportunities. The current infrastructure in Lypstone village is at capacity and cannot cope with further demands on it. Narrow roads with lack of pavements are at their safe limits. Doctors, schools, and drainage systems cannot cope with further pressures.

The plan does not address financial implications of having another Parish's housing site impacting Lypstone. Woodbury Parish has four sites (LP Wood 08/04/07/14) that were considered and rejected for either being 'agricultural fields' or having 'adverse landscape and heritage impact'. However, all of these sites are within walking distance of all facilities and have access to bus routes to Exeter and the airport, in addition to a direct route to the A376 at Clyst St George, which would alleviate traffic congestion on the A376 towards Exmouth. The same criteria have not been used to reject sites in Lypstone. This would solve the problem of GH/ED/72 (a prime agriculture field sitting close to Grade 2 listed buildings and historical burial ground) affecting Lypstone Parish and its infrastructure. Fair application of the criteria would certainly mean GH/ED/72 would be rejected.

The plan moves BUAB to fit in with target numbers and ignores how their proposals actually fit into Parish boundaries.

The planned sites will lead to coalescence with Exmouth

Too much green wedge, coastal preservation area and agricultural land is sacrificed to meet housing targets in areas that cannot match their development with local employment opportunities.

The wishes of communities already expressed in their democratically approved Neighbourhood Plans are ignored.

The effects and impact caused to local residents and their quality of life of any approved site, regarding its construction traffic, combined with the length of time involved, has not been addressed in the plan.

The rights of our residents to an environment that preserves our green spaces, wildlife and natural beauty in our local landscape to enhance their health and well-being is not valued by proposing so much development in the east of the area.

Proposal:

In view of Central Government's review of planning guidelines, currently changing and in development, it would be ideal if EDDC readdressed the housing quotas and work with Parish and Town Councils and Local Residents Groups to identify both the required number and type of houses to properly inform the search for sites across the whole of East Devon as opposed to the current focus on the west of East Devon.

ANNEX

East Devon Local Plan, 2020-2040 (Lympstone)

Comments from the Lympstone Flood Resilience Group

We note that Strategic Policy 35 relating to flooding is still to be finalised, but will be in line with the requirements in the NPPF. However, as it stands at present it is rather thin and we would like to see mention of the need to ensure that development does not increase the flood risk of villages, such as Lympstone. downstream of proposed extensive new development.

There are six areas currently described as preferred choices for development in Lympstone Parish (see map in Appendix 1) on which we wish to comment

These are LP GH/ED72, GH/ED73, GH/ED/75, LP Lymp 01, LP Lymp 09, and LP Lymp 10a

The Wotton Brook Catchment is the most critical concern regarding new developments, and our principle is that with appropriate SUDS attention, any new developments should improve on the pressure that the catchment places on Lympstone Village and its flooding potential. The catchment, shown in the LIDAR diagram below, is a rapid response catchment as defined by Devon County Council and The Environment Agency and as such has been extensively modelled and studied with the objective of reducing the 'flashy' runoff which currently occurs, and which in turn can flood the village.

There is a very real possibility of increasing the flood risk to the village without very careful analysis. We understand that a Strategic Flood Risk Assessment has been commissioned by the District Council. We have requested that Lympstone Flood Resilience Group, a working group of Lympstone Parish Council be consulted in the preparation of this assessment.

Modelling has shown that Natural Flood Measures (NFM) when applied to the catchment can reduce the existing runoff, and currently the farmers and landowners are being consulted in order to evaluate and to implement such measures, for which budget support is available. Clearly therefore any new development which overrides these landscape and soil improvements planned should in principle match or better the resilience that would have been achieved from the same footprint. The catchment is currently one of a small number nationally and a couple of dozen in Devon awarded investment attention under the Devon Resilience Improvement Program (DRIP) in order to improve flooding resilience in the Village.

The proposed areas

LP GH/ED73 is a development within the Parish on a site which we believe must be made to drain outside of the catchment following the principles established during approvals of the most recent road of new housing, Gulliford Close, adjoining the proposed site off Strawberry Hill. Equally the site facing across Meeting Lane (LP



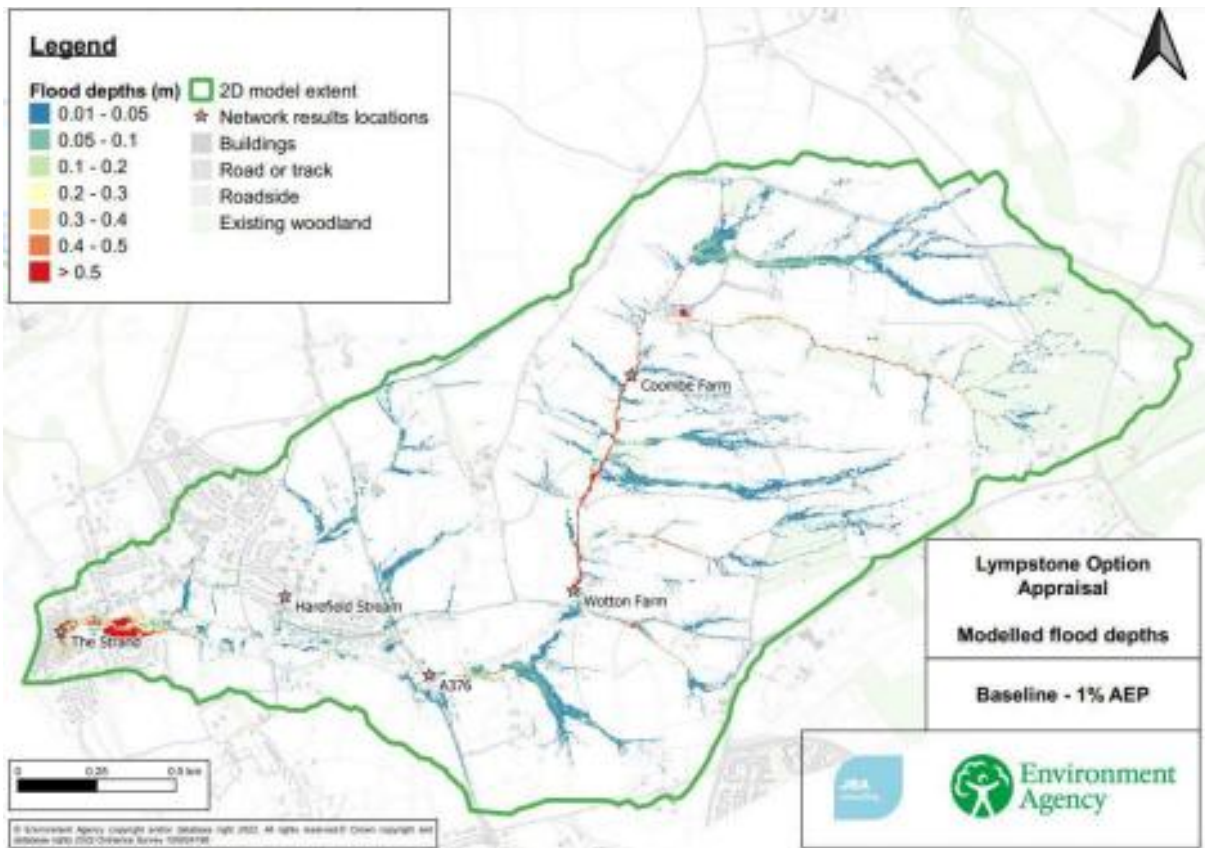
GH/ED72 which is in Woodbury Parish must also drain outside of the Wotton Brook catchment, and to the North. With these points agreed the two sites will put no new burden on our Wotton Catchment.

LP GH/ED75 is a small site off Grange Close which naturally drains into the Harefield Stream and then into the Wotton Brook. The stream passes under a culvert in Longmeadow Road. The properties around this culvert have been flooded on a number of occasions. Devon County Council undertook a study of the area and have carried out some improvement work to the culvert. However, the cottages in the area of the culvert still remain at a high risk of flooding and any increase in run off from this site would only increase this risk. Because this area has flooded in the past unless the drainage can be diverted from the Harefield Stream this site should not be developed.

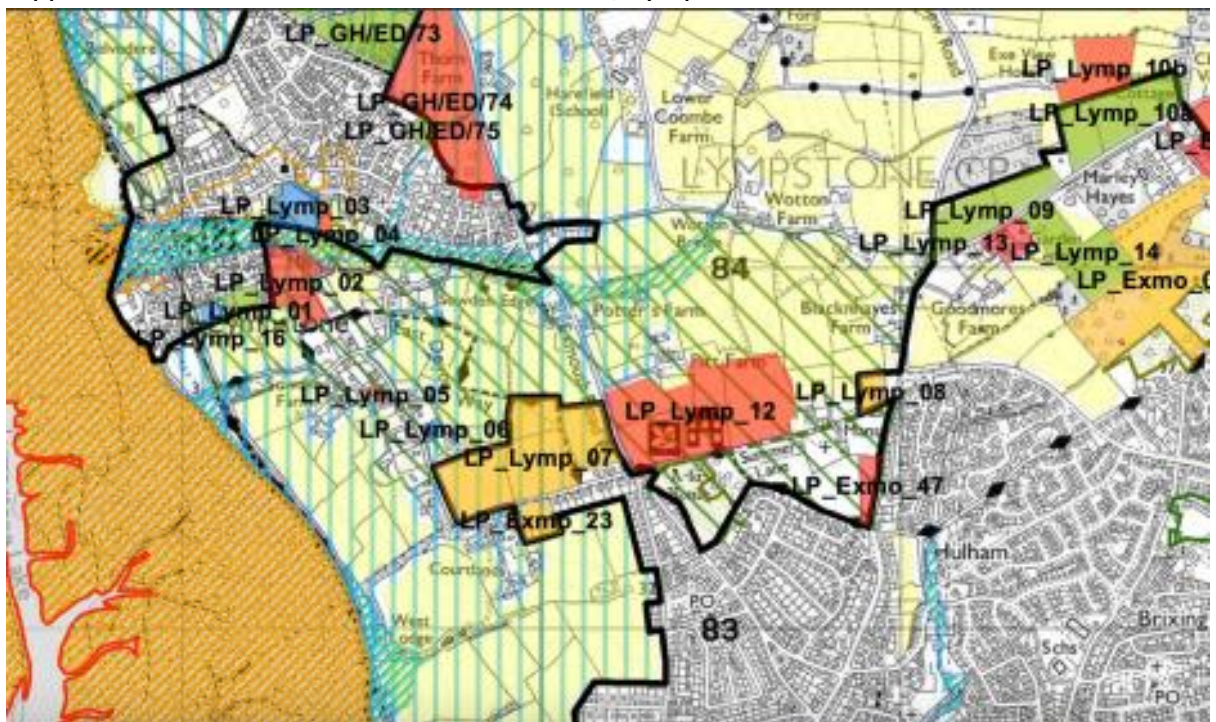
LP Lymp 01 is located on high ground, at the crest of the landscape and some surface waters from this location would drain towards Wotton Brook and some would naturally drain away from the Wotton Brook Catchment, and in our view any development here must ensure that all waters are directed away from The Brook and Lymstone. This may require attenuation. However, the Southerly drainage may prove to be an unacceptable burden on the pumping station which currently handles the properties around Sowden House and Sowden Farm. This should be carefully reviewed.

LP Lymp 09 and LP Lymp 10a are a major concern. An example of the runoff from these locations is shown below, and it can be seen that drainage from the north side of Hulham Road has great sensitivity. The blue lines indicate current surface runoff as modelled, and as previously mentioned various NFM Measures to reduce the runoff are being explored with landowners and are under consideration under DRIP.

Retention or attenuation in this area would be critical to ensure that the targets set for the NFM improvements to this area are matched or bettered. We are concerned that this area is potentially very unsuitable for development for these reasons.



Appendix 1: East Devon Local Plan 2020-2040, Lymestone



Appendix D

Response for Strategic Planning Meeting 3rd September 2024 - Lympstone 07 site

We cannot understand Lympstone 07's journey from being a second-choice site to preferred, and now recommended for allocation, when the Agenda Reports Pack states '*Land north of Courtlands Lane ... was highlighted as being a very unpopular choice for development*'. There is also a contradiction in the site selection report which states: '***On account of matters to include landscape and heritage constraints this site is not identified as appropriate for allocation for development.***' How can this site be seriously considered when your own paperwork shows it was not recommended by your own officers?

This site is in the Coastal Preservation Area, has the sensitive ecology of the Exe Estuary (SSSI site) in close proximity and must be further evidence and reason not to allocate.

This site received the joint highest opposition during our last public consultation and has already been the subject of a Public Enquiry finding **against development**. That ruling was hard won and very dear to the hearts of Lympstone residents. Part of it stated that 400m green space should be left to prevent coalescence. As recently as 2022 an appeal for just one dwelling was refused by the Inspectorate on grounds of maintaining separation between Exmouth and Lympstone. If development proceeds then coalescence, which planning decisions have consistently resisted, will become a reality and a very sad day for our village.

Previous rulings against development have also highlighted the unsuitability of Courtlands Lane for increased vehicle traffic and the danger to pedestrians using it to access the village centre. Courtlands Lane is narrow with few passing places, it has no footways and it is unlit ... so it is madness to have such increased traffic and footfall.

Even if a new access point was punched through a mature hedge and bank from the new Dinan Way extension junction, giving cars better access to the village centre, cars would still have to use Courtlands Lane or go out onto the A376 and in at the Saddlers Arms, which is already a severe pinch-point. A new access would not solve the problem of pedestrians having to walk to the village centre and school along dangerous lanes, or through fields via unpaved unlit Public Footpaths which are often impassable during wet weather.

The Parish Council were disturbed to learn there have already been meetings between the developer and Lympstone Football Club about the possibility of a dedicated facility within the site. However, experience has shown what is sometimes promised or planned in the very early stages of a development does not always come to pass – may I just say Goodmores, Primary School, Sports Pitch! So, to allocate it on these grounds would be unsound.

When you weigh the need to achieve a target number of houses, please consider our concerns and arguments carefully as these fields are the green wedge recommended by the Public Enquiry findings and keep us a village properly separate from Exmouth.

Appendix E

East Devon Local Plan – allocation site selections (source: Agenda Item 9, EDDC SPC 29 October 2024)

Sites at and around Exmouth

*Exmouth is the only tier 1 settlement in the local plan and as such, in plan strategy terms, it is an appropriate location for **higher levels of development**. It is the East Devon town with the greatest number of services and facilities. However, in comparison with existing dwellings in/at the town (and population share) the agreed allocations at the town do not provide for proportionately high growth levels. It should be noted that a number of assessed sites are in Lympstone Parish but they abut/are deemed to be ‘at’ Exmouth in respect of plan policy.’ (page 11)*

Sites at and around Lympstone

*Lympstone is a tier 3 settlement in the local plan and, as such, is suitable for **moderate levels of growth**. Members have previously agreed to allocate a total of 60 homes in the village but there are two large sites that adjoin one of the previously agreed allocation that could present opportunities for larger scale development in this location.’ (page 46)*