

Lympstone Parish Council Response to Draft East Devon Local Plan

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 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, wild life 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) have 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 |

Lympstone 07 Opposite Courtlands **100 houses**

- This site is a Second Choice one currently but, if approved for development, would be inside 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 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 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/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 wild life.
- 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 have 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

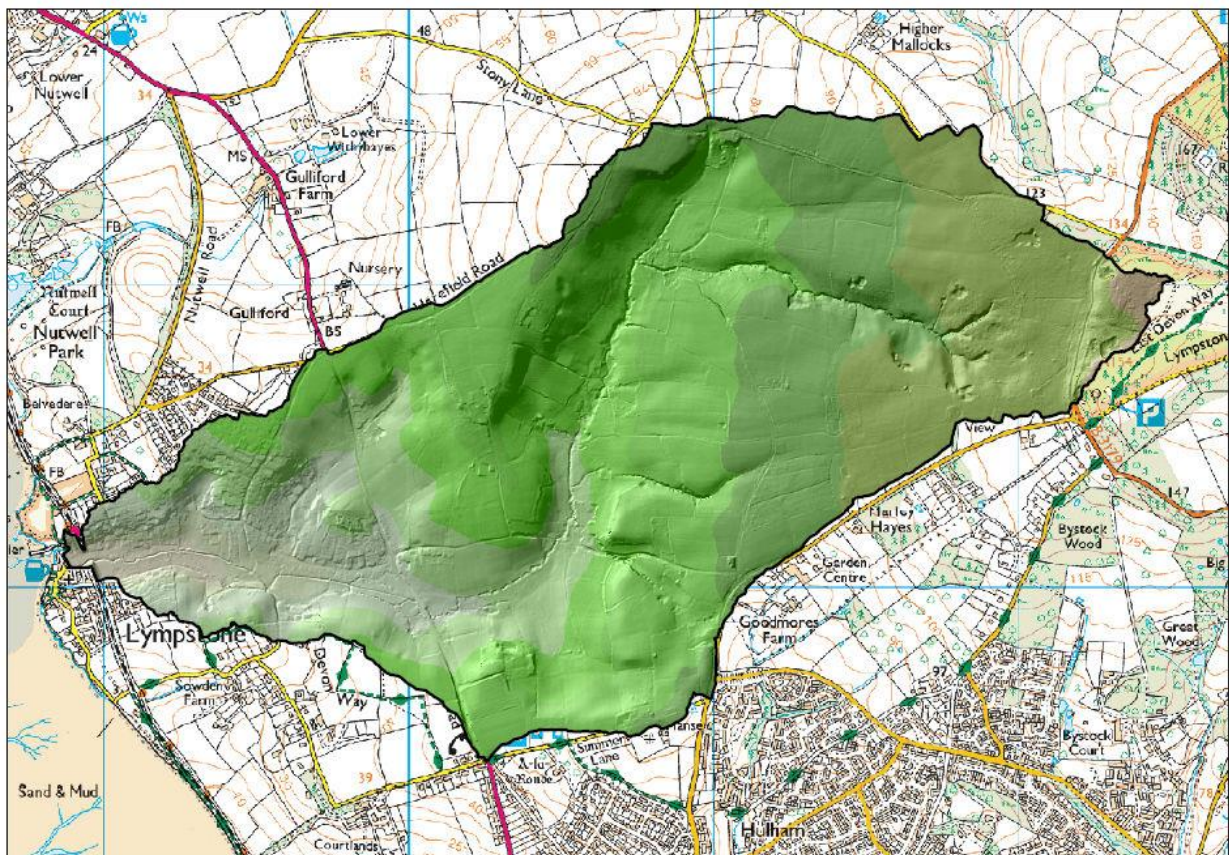
The Wotton Brook Catchment is the most critical concern regarding new developments, and our principle is that with appropriate SUDS attention, any new developments should improve on the pressure that the catchment places on Lympstone Village and its flooding potential. The catchment, shown in the LIDAR 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 Lymptstone Flood Resilience Group, a working group of Lymptstone 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



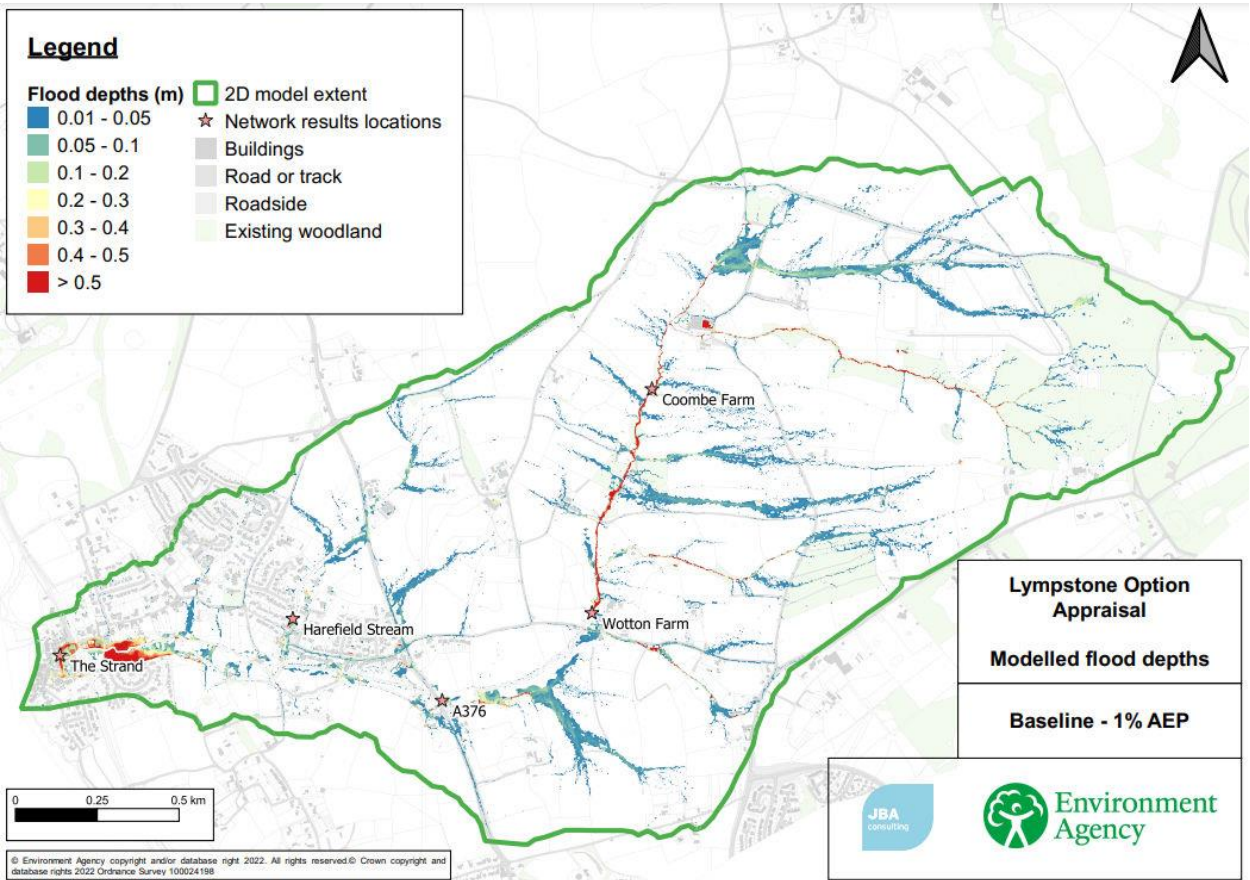
GH/ED72 which is in Woodbury Parish must also drain outside of the Wotton Brook

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 Lympstone. 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

