

**From:** Andrew Minter [REDACTED]  
**Sent:** 09 January 2023 10:25  
**To:** Planning Policy  
**Subject:** East Devon Local Plan 2020-2040 - Comments and Objections  
**Attachments:** OBJECTION.docx; ATT00001.htm

**Categories:** Reg.18 consultation

Dear Sir/ Madam

As a proud resident of Lympstone Parish, I am writing to register my extreme concern and objection to the draft East Devon Local Plan 2020-2040, in particular where it relates to ALL first and second choice sites in Lympstone Parish and those first and second choice sites in north-east Exmouth, along the Hulham Road on the way up to the Pebblebed Heaths and Lympstone Common.

Please can you register all my objections against the draft plan. [Please note that I have also attached a Word document version of this email].

## 1. Recent Government Announcement

I am obviously aware that East Devon District Council (EDDC) has compiled its draft plan under central government instruction that the area must find land on which to build a MANDATORY number of new houses.

However, with Michael Gove's recent retraction of this on behalf of the government, stating that the house-build numbers are not mandatory, I request that the current Plan process is stopped and that EDDC re-review its actual requirements, rather than those previously imposed as mandatory by the government.

Other councils around the country have enacted this 'Stop and Review' (from national press reports and from Any Questions on BBC Radio 4), so EDDC would not be acting unilaterally in following this course of action.

## 2. Process and Communication

Both have been woeful.

There has been no, or negligible, communication of the draft plan process to residents, and the consultation period has been short and timed (purposely, it seems) to coincide with Christmas and New Year, when residents thoughts do not naturally turn to trying to prevent the desecration of their green wedges, green spaces, agricultural land, villages and towns. EDDC is extremely proficient in notifying about increases in council tax and changes to bin collection dates, but when it comes to building thousands of new, unplanned houses in wholly unsuitable areas, there has been no direct communication with households.

The consultation tool, Commonplace, is cumbersome, difficult to navigate and disenfranchising to vast swathes of East Devon residents who, for reasons of age, lack of computer access, access to the internet or lack of expertise, do not have the chance to easily object or voice their opinions to the draft plan online.

I am a seasoned computer-user of 35 plus years and I found Commonplace difficult to navigate, use and register opinions.

The alternative methods of registering opinion to the draft Plan, email and 'snail-mail', were very much hidden away and difficult to find. In addition, the postal strike will also have further disenfranchised those whose only method of registering their comments is the traditional postal system.

In not properly communicating the consultation process, and in using Commonplace, the process has been anti-democratic and it has disenfranchised residents who have a right to reply.

### 3. The Draft Plan Does Not Meet its Objectives

I bring to your attention the comments of East Devon MP, Simon Jupp (Conservative), who stated:

*“East Devon District Council’s new (draft) 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 own communities, reduce travel to help the environment or keep families close together. This is less of a plan and more of a missed opportunity”.*

The draft Plan does not provide residents of Lympstone with a real picture of the extent of the proposed house building within Lympstone Parish. The maps and figures are NOT attributed to Lympstone Parish, but to Exmouth (see LYMP\_08, \_09, \_10a and \_14; together these provide 188 houses in Lympstone Parish, which have been given to Exmouth). In developing these stated sites, the Green Wedge between Lympstone and Exmouth will be destroyed forever and Lympstone will lose its identity and become part of 'greater Exmouth'.

EDDC is redrawing boundaries WITHOUT consulting residents. You are not representing residents' rights, which you were elected to do.

The draft local plan proposes that new homes are built in Lympstone and Exmouth as:

*“Exmouth is very well supplied with services and facilities with a large secondary school and primary schools, a variety of shops, sports facilities, a library, GP, hospital, railway station and regular bus services. The town centre, where most facilities are located, is positioned in a south westerly part of Exmouth. A consequence of this is that towards the outer edges of the town many residents are comparatively remote from some services and as such can be car dependent.”* (EDDC draft Local Plan page 70)

The proposed development sites in east Lympstone and north-east Exmouth (LYMP\_08, \_09, \_10a and \_14, and EXMO-12) are on the outer edges of the town; they are more than 1.75 miles (as the crow flies, from the nearest edge of these proposed developments) from the centres of Lympstone and Exmouth, where the train stations are located.

The plan statement ignores the FACTS that there is no infrastructure for these houses:

- Doctors and dental services are at or over capacity and no additions are planned.
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- Exmouth Community College (the ONLY secondary school) is full and children are being bused to other schools outside the town. Lympstone of course does NOT have a secondary school, but the village primary school is at capacity and over-subscribed.
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- The sewage and waste infrastructure (excluding the treatment plant itself) is inadequate, with raw sewage often being discharged into the estuary at Lympstone and the sea in Exmouth as a result.
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- Further erosion of green spaces will increase flood risks to which Lympstone and Exmouth are already dangerously susceptible. Water travels downhill and in periods of rain, there are rivers flowing down Hulham Road and Wotton Lane directly down to the A376 and Lympstone Village. SWW have frequently been called out to clear attenuation tanks in Lympstone village to prevent flooding in the village itself.
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- Bus services to and from Lympstone have recently been cut. The reality for residents of Lympstone is that car use is essential, primarily on the A376, which is already stretched beyond its limits.
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- The draft plan's sustainability report commentary on Connectivity and transport suggests that development for Lympstone is very positive because of the rail station. Residents in most recent developments do not use the train because there is no direct route to the station to encourage them to walk and there is zero available parking in the village. This will be the case with the sites on the outskirts of Lympstone and Exmouth, very distant from the station.
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- Hulham Road and Wotton Lane, where these developments are proposed, have no ability to be widened and provide alternative transport infrastructure (footpaths or cycle paths); cars are the only method of transport provided for, and both roads are already dangerously over-used. Wotton Lane and Summer Lane would provide the EASIEST access to the A376 from this proposed development. Both are SINGLE LANE country lanes with some residential housing thereon, and are already used as a rat-run, resulting from the lack of road infrastructure provision after the development of the housing estate on Dinan Way, 30 years ago! The draft Plan proposal will only increase the use of these single-track country lanes, making them impassable and hell for people living on them. On Hulham Road, there is no footpath or cycle-path and none will be possible due to the number of protected green spaces, TPOs and private land. The same is true for Wotton Lane. This goes against Devon County Council's Climate Policy of reducing the number of cars on Devon's roads.

At the EDDC presentation at The Ocean in Exmouth, I discussed these issues with one of the EDDC planners on parade. They stated that, due to the remote locations from the village and town centres and the narrowness of Hulham Road, transport links would be a problem, but that they were likely to be executive homes for people commuting to Exeter or further afield by car! This is not required; WRONG place and WRONG development!

#### 4. Sustainability and Environment

As already stated, the draft plan sets out that train stations were a positive reason for these developments. Both Lympstone and Exmouth stations are at least 1.75 miles distant from the proposed sites in Hulham Road, with no or severely limited parking at both stations, and a long uphill climb along non-lit busy roads and country lanes to reach the sites of these proposed developments for those who brave walking or cycle, particularly in winter. People won't use trains; they will use their cars. This is in direct contradiction to the DCC Climate Policy. 500 houses means at least 500 more cars, probably double that number, with no improved road infrastructure.

Lympstone and Exmouth are badly served by buses, and services have recently been cut to Lympstone.

The plan states '*proximity to employment*' as a reason for development. Lympstone is a village and provides minimal employment. These houses, outside Lympstone and Exmouth BUABs, will be habited by absent property investors, second-homers, holiday lets and commuters to Exeter and further afield. They will not be part of Lympstone or Exmouth. For your information, a FoI request showed that as at 20 May 2022 there were 2,637 second homes in East Devon and of these 603 (23%) were in the Exmouth and Lympstone parishes. In addition, at the same date there were 1,909 Empty properties in East Devon and 491 (26%) of these were in the Exmouth and Lympstone parishes. It is likely that one quarter of any development will provide second homes rather than needed primary homes for residents.

There is no SWW infrastructure to the proposed development area. There is no possibility of improved road infrastructure to the proposed development area. There are no utilities infrastructure to the proposed development area.

These will not be affordable houses for first time buyers or aging downsizers who want to be within walking distance of the heart of the community for support, rather than on the distant outskirts of Lympstone and Exmouth. They will be medium-density executive housing for commuters elsewhere who will bring no economic benefit to the area.

Lympstone has protected areas afforded by the Coastal Preservation Area and the Green Wedge. EDDC seem to think it fit to be able to unilaterally change or ignore these, effectively making them irrelevant.

Lympstone's Coastal Preservation areas and Green Wedges deserve protection, as they were hard-fought and won by Lympstone Parish to preserve Lympstone's environment, heritage and separate identity. EDDC should not ride roughshod over and ignore them merely because some landowner is willing to sell their land for development. This is wrong, wrong, wrong. It is absolutely shameful that EDDC is disregarding these designations but honour AONB status elsewhere in East Devon. Is it because so many councillors live in Sidmouth and Budleigh Salterton? It appears so.

EDDC is disregarding the status of Green Wedge and Coastal Preservation Area as an inconvenience to its flawed plan for Lympstone and Exmouth. Building hundreds of houses on the protected Coastal Preservation and Green Wedge areas surrounding Lympstone and between Lympstone and Exmouth will hasten the end of Lympstone and the destruction of much of the precious environment, which we should be preserving for generations to come.

## **5. Negative Impacts from Developing Sites**

**LYMP\_08 Off Summer Lane \_ 14 houses**

**LYMP\_09 Junction of Exe View and Hulham Road – 54 houses**

**LYMP\_10a Upper Hulham Road – 75 Houses**

**LYMP\_14 Below the Coles – 59 houses**

These developments, in conjunction with the others, will have a huge negative impact on the health and wellbeing of Lympstone Parish residents.

Suggestions in the report of easy access to bus and rail and employment opportunities are unrealistic and presented in a misleading manner. Car use will be the norm for persons to travel to work on already overcrowded roads.

The current infrastructure struggles to cope and schools, GPs, roads, public transport, flooding and drainage will be negatively impacted. Few, if any, other areas of East Devon are being impacted upon in such a significant and disproportionate manner. Additionally, the A376 and RD&E hospital are both at capacity.

The development will have significant negative effects on the environment.

Farming land will be lost.

The green wedge between Lympstone and Exmouth will be seriously eroded; this directly contradicts your policy. It will accelerate the coalescence of settlements, destroying the sense of place and identity for residents.

The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents.

Valuable wildlife corridors will be lost.

Important areas of landscape and visual amenity will be lost forever.

Important dark skies will be lost , further damaging the environment with light pollution from the proposed development.

## **6. Conclusion**

The EDDC draft local plan is not fit for purpose, is now out of date, is undemocratic and delivers profits for developers at the expense of East Devon residents, whose needs and rights seem to have been ignored. EDDC, through Commonplace, have made it purposely very difficult for negative responses to be recorded. This reflects the ill-considered nature of the plan and the underhand way that the consultation period has been managed.

This must change with full recognition given to the real position and far greater emphasis placed on ensuring that any new homes built are affordable housing for existing residents nearer to the centre of Lypstone and Exmouth.

To achieve this the following actions should be taken by EDDC in respect of the current draft of Local Plan.

EDDC needs to stop the current process to allow the full impact of the new rules announced by Michael Gove to be included, to give EDDC greater freedom when calculating the homes to be built to take account of the local constraints in Lypstone and Exmouth which I know does exist.

EDDC needs to Increase the delivery of new homes from the planned new settlement north of Hill Barton from the current delivery of 2,500 in the planning period to at least 5,000, so lessening the burden on Lypstone and Exmouth.

EDDC needs to remove the sites allocated in the east of Lypstone and the north-east of Exmouth (LYMP\_08, \_09, \_10a and \_14) which, due to them being far outside the village and town centres will create medium-density executive housing taken up by new residents moving into the town and then commuting back to their employment in Exeter and further afield.

Seek more brownfield/ pre-used sites close to the centre of Exmouth (e.g. the disused police station and post office, relocation of EDDC facilities at Camperdown Terrace) for allocation to affordable housing.

Communities recognise the need for development but members and officers of EDDC should be seeking organic, sustainable and equitable growth across all of East Devon. Respect the views of communities and work with them to achieve a way forward that is agreed rather than imposed. Communities like Lypstone deserve the opportunity to thrive and survive rather than be buried in inappropriate housing simply to shelter other areas of East Devon from any development.

This is a great opportunity for EDDC to DO THE RIGHT THING for East Devon's future. Please don't waste it by destroying the things that make East Devon such a beautiful environment, a natural and nature-loving area and a pleasant place to live.

Yours faithfully

Andrew Minter

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