

Filtered Data Export

**Full name:** Lucy Tyrrell

**Organisation (where relevant):** Lympstone Parish Council

**Other party name (if relevant):**

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**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

**Full name:** Lucy Tyrrell

**Organisation (where relevant):** Lymptone Parish Council

**Other party name (if relevant):**

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**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

**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.:** ENV-033 Mitigation of Air Quality Impacts - East Devon Pebblebed Heaths – Technical Report (Nov 25):

The study indicates that the modelling for 2042 shows that air-borne pollutants will be higher than expected. LPC have long been concerned about air pollution impacts on the residents living adjacent to the Saddlers traffic lights, and requested that the air pollution monitor be moved to the built-up side of the lights two years ago. This in order to assess the current risk and enable suitable assessment and mitigation of the impact of additional traffic, in particular heavy goods traffic being diverted from Liverton Industrial Estate via the Dinan Way Extension. The junction between Hulham Road and the B3169 (within Lymptone and directly on Pebblebed heaths boundary) has a steep incline and that heavy vehicle usage will generate even worse pollution than other stretches next to the Pebblebed Heaths. Developments that encourage further commuter traffic should therefore be restricted.

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**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns 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

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

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

Infrastructure Delivery Plan: No infrastructure upgrades, SANGs, or suitable alternative pedestrian/cycle routes to mitigate increased reliance on car dependency from new developments planned in Lympstone, yet Lympstone is in the top three parishes for housing allocations.

Note: LPC is awaiting updates on its Proposed Landscape Plan for active travel improvements from DCC Highways Officer (agreed to reassess the junction at Harefield Cross) and \*\*\* Personal details have been removed \*\*\* , Green Infrastructure Manager, EDDC.

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**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

**1(b). Does your comment relate to one of the changes listed in the table above?:** 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.:** Housing requirement for Lympstone has risen from 323 to 350, an increase of 8%, or 27 more houses (compared to Round 1 Reg 19 consultation). As of January 2026, allocated sites account for 275 houses. NB Lympstone currently has more than four people per hectare (based on 2021 Census). It is the most populated parish in East Devon, excluding some small towns. For the period 2012 to 2026, in accordance with EDLP, Lympstone accommodated 40 dwellings, plus a further share of the 315 houses at Goodmores. Total dwellings in 2015 (excluding Goodmores) 949. 350 additional dwellings represent a 37% increase. This is an excessive increase for any village within East Devon.

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**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.:**

7.4

**1(b). Does your comment relate to one of the changes listed above?:** 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.:** Water Cycle Study CCF-001: EDDC (Strategic Planning Committee) have stated that certain areas will have a building moratorium placed on them until South West Water (SWW) have resolved sewage capacity. EDDC should indicate where these areas are (including a map) and state criteria for infrastructure being in place (not relying on SWW saying will be achieved some time in the future). LPC have doubts that the reduction in water efficiency from current 125 litres per day to 110 litres per is achievable – it is more aspirational and appears to just be a method by which SWW can achieve theoretical sewage reductions. In LPC's opinion this is not evidence based.

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**Organisation (where relevant):** Lymestone Parish Council

**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.:** AR02

**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.:** [see also representation re. Policy AR01 and AR02

Strategic Policy AR02: Water Quality: The section on climate change adoption only includes flood risk assessment and does not adequately cover water quality and biodiversity. There are many examples of current planning applications in Lymestone where Water Quality issues are not addressed in the relevant application, for example where planning applications do not comply with the national Sustainable Drainage Systems (SuDS) standard 2025 or the National Planning Policy Framework (NPPF) Chapter 15, and therefore conflict with this new policy - to protect, manage and improve water quality in all water bodies affected by development in East Devon.

There is already concern and reported pollution events resulting from flooding from the construction of the Dinan Way Extension, particularly as this has not been designed to take account of the latest advice on the implications of climate change. Planning permission was granted in 2017 and although the work did not start until 2025, the scheme was not redesigned to meet the revised standards. LPC know of three pollution events reported to the Environment Agency already.

Currently in periods of rainfall, we see plenty of evidence of brightly coloured sediment laden surface water runoff from fields which already cause significant flooding in Hulham Road, Exe View Road and Wotton Lane, and ultimately drain into the Wotton Brook rapid response catchment, and from there into the Exe Estuary (SSSI, SPA and RAMSAR site).



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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. 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.:** Strategic Policy AR01: Flooding and new Strategic Policy AR02: Water Quality and Efficiency:

A new item in the EDLP is the Strategic Flood Risk Assessment Level 2 CCF-002 – Cumulative Impact Assessment (Parish Map), which identifies that Lympstone is at a high risk of cumulative flooding, and therefore development proposals should help to reduce flood risk overall by demonstrating in particular the Flood Risk Assessment considers the potential cumulative effects of the proposed development. LPC understand from this that a sequential test will be employed on all major development sites in Lympstone, and expect wider sustainability benefits for the community to be proposed should major development go ahead.

The Westcountry Rivers Trust Upper Wotton Brook Catchment Study which forms part of Lympstone Flood Risk Management Project has detailed information on the risk of flooding to the conservation area in Lympstone. Any new building development will create additional run-off, which, if not following the natural drainage routes, will cause more pollution and disrupt the natural flows - bringing significantly increased risks during periods of heavy rainfall and drought. Irrespective of proposed attenuation provision, run-off from hard-standing will be greater and flood and pollution risk will be exacerbated.

The Environment Agency is investing £1.2M in flood wall improvements in Lympstone specifically to reduce the risk of flooding for 100 properties and services in the village centre. Additional windfall sites have not been included in the EA's extensive research

and modelling for this project, which is designed to provide betterment. Any additional water volume from development higher up in the Catchment will impact the outcome of this project.

Recent Highways drainage works carried out at the top of Wotton Lane and Exe View Lane (December 2025) were to improve surface water drainage at current levels. There is no provision for additional surface water from the windfall site(s) further up the Catchment area i.e. fields opposite King's Garden Centre. The same applies to the drainage constructed for the Dinan Way Extension which has been built to 2016 standards.