

[REDACTED]

From: Planning Policy
Sent: 17 January 2023 15:15
To: Planning Policy
Subject: FW: Response to consultation on the proposed East Devon Local Plan

Categories: Reg.18 consultation

From: gracepackman [REDACTED]
Sent: 11 January 2023 14:45
To: Planning Policy <PlanningPolicy@eastdevon.gov.uk>
Subject: Response to consultation on the proposed East Devon Local Plan

East Devon District Council is currently consulting on its proposed new Local Plan. This is my response to the consultation, in which I focus on my concern about the proposals in the plan with regard to the Lympstone and North Exmouth area.

I agree with East Devon MP Simon Jupp, who (in a column in the Exmouth Journal on 7 December) has described East Devon's plan as 'woefully unimaginative'. As Mr Jupp points out, currently the bulk of proposed new housing is planned for the west of East Devon rather than spread across the county. The Local Plan proposes Exmouth as a Tier 1 settlement. As a result the proposed targets for housing development are wildly disproportionate, with profound and very concerning knock-on effects for the small and historic parish of Lympstone.

I am extremely concerned that Lympstone is identified as one of the five local centres explicitly identified as offering scope for development.

Any building development in the parish raises concern about environmental impacts, particularly increased flood risk but also the loss of agricultural land and wildlife habitats. Any building development in the area puts additional strain on infrastructure, especially water and sewerage systems, and school and health services. It also puts additional strain on transport services and will inevitably lead to increased traffic with the associated delays, damage and danger that increased traffic flows produce. The plan proposes preferred sites for development which would exacerbate all these problems and does nothing to protect the 'green wedge' between Lympstone and Exmouth, or the Coastal Preservation Area.

As Mr Jupp also asserts: "Councillors should not be allowing historic towns and villages to merge into one another." Lympstone is an historic settlement and a small community. The house numbers on development sites proposed are completely out of proportion with the current size of the village, and its unique character risks being destroyed. EDDC seems to be mindful of this as an issue across the rest of the county and I urge you to pay the same regard to the issue here.

According to the Plan, "The exceptional landscape quality and coastal location of Budleigh Salterton constrains its potential for development." I am dismayed that the landscape around Lympstone is not afforded similar consideration. I am sure that residents of Colyton, another village identified as a 'local centre' share similar concerns. It is astonishing to me that of five 'local centres' identified across the whole county, two, Lympstone and Woodbury, are contiguous. This is hardly a sensible, or a fair, spread of potential development. The thinking in the plan seems to be that because there has already been a considerable amount of development in an area - ie Exmouth - it must be a good place to put more.

The infrastructure in Lympstone and north Exmouth simply could not and will not cope with the amount of development earmarked in the plan. Our schools are full. The Plan suggests that Exmouth benefits from 'a large secondary school', yet secondary school children from the area are being bussed to Exeter schools because that large secondary school is full to bursting. Local health services, including doctors and particularly dentists, are oversubscribed.

Most significant, in my view, Lympstone is already prone to flooding. Even small developments significantly increase the flood risk, and this must be addressed before developments, especially large developments, are contemplated. We know that sewage is already released into the Exe far too often - how much worse will this problem become if hundreds of new houses are encouraged in the parish?

At present the proposed Plan pays woefully insufficient regard to the possibility of developing brownfield sites across the county. This must happen prior to any consideration being given to the development of greenfield sites. (EDDC could also do a great deal more to address the problem of second and holiday homes reducing available housing stock for residents which is acute across the whole county.)

The Government has recently announced changes to housing targets such that the thousands of new homes previously suggested as being required across East Devon are no longer mandated. The first debate should be how much development is actually needed in the county, and then any development must be strategic and planned for the long term. The Plan may have this as a stated aim but it singularly fails in execution.

With regard to particular sites mentioned in the Plan as possible allocations for development:

LYMP_07 Courtlands Cross suggests the potential for up to 100 houses. Planning permission for this site has already been refused twice, and the grounds for objection and rejection have not changed. This land should not appear in the plan as a potential development site.

GH/ED/72 - Land at Meeting Lane, Lypstone, is proposed for 131 new houses. This is simply unconscionable. Such a development would be completely disproportionate and environmentally damaging. The strain on services including roads and public transport would be huge and the effects on drainage and flooding would be extremely damaging.

GH/ED/73 - Land north-west of Strawberry Hill. This proposes the possibility of development of 46 houses. Although smaller than those noted above, this nonetheless would have significant deleterious effects on the environment, infrastructure and services.

LYMP_09 and LYMP_10a to the north of Hulham Road. Development here would have negative environmental impacts, and would destroy some of the 'green wedge'. These areas are not close to the rail infrastructure, bus routes are inadequate, and the negative impact in terms of traffic would be considerable.

The proposed Local Plan is not fit for purpose. It claims to pay attention to environmental needs, to conservation and to sustainable development, yet it does nothing of the kind. Please look again and present to residents a new strategic and balanced East Devon Plan with a long-term vision and adequate regard to infrastructure and environmental needs.