

**East Devon Draft Local Plan Response from
Brian Alexander Murray**

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Introduction

I am extremely disappointed with the East Devon Local Plan 2020 – 2040, particularly where it applies to all first and second choice sites in Lympstone Parish.

I ask that you register each of my objections against both the process used and the specific proposals where they apply to Lympstone Parish.

As a new local parish councillor, I would like to defend East Devon as a local authority, but with regard to this report and the associated process I find it to be so dismissive of local views, the green wedge and the coastal preservation area that it is impossible to do so.

The plan fails to meet the vision it seeks:

It's plans for Lympstone Parish will not provide affordable housing in the right location.

Ignoring the Coastal Preservation area and the Green wedge around Lympstone by building houses on it will not support our natural environment or address climate change – it will threaten it.

The only prosperity your plan delivers is for the developers. It ignores the needs of residents and visitors as captured in the neighbourhood plan.

The Local Plan as proposed for Lympstone Parish negatively impacts on your objectives 1,5,7,8,9,10 & 11. In addition, unless significant changes are made in the planning and development process the plan is unlikely to address objectives 2,3,4 and 6.

Process:

The consultation exercise appears to be deliberately manipulated to minimise negative responses from residents.

My evidence for this is:

I am a resident of Lympstone and I first heard about the "Plan" from the Parish Council. I was not aware of it through any other means. East Devon District Council failed to bring it to my attention.

When EDDC is going to change the day that a bin is being collected because of a public holiday they provide a hard copy notification to each household despite it only being a minor inconvenience. They give precise information. However when the quality of life of Lympstone residents is going to be negatively impacted upon forever with an additional 500 houses no notification is provided. Any notification that is received online is non-specific and makes no mention of the scale of the issue.

When the consultation exercise is advertised online or elsewhere it is non-specific for residents. It suggests commenting on the possibility of a new town or having a say on East Devon in the future. It does not give any indication of the seriousness of the situation. It does not inform residents of Lympstone that they will have 500 houses on their doorstep and be merged with Exmouth.

The online consultation tool is overly complex and laborious. It is difficult to use and restricts the respondents from easily commenting on several sites at once. The tool (and plan in general) prevents Lympstone residents viewing all sites in Lympstone Parish.

The figures provided and the maps used are in different locations making it difficult for readers of the report to understand the true impact. Maps should have been annotated with housing numbers; something that could have easily been achieved.

At meetings where the plan has been discussed EDDC councillors have informed the meeting that if EDDC receive responses that are an apparent copy of others they would only be counted as one response. This appears to me to be a deliberate attempt to make the process more difficult than it needs to be and designed to minimise expected and deserved negative comments. It is the views of individuals that matter. If views are shared by individuals then there is no reason whatsoever for similar/ identical responses to be discounted. Suggesting that EDDC will do so is deliberately manipulating the amount and content of responses.

There is simply insufficient time allowed for the consultation. EDDC have not notified residents of the specific implications for individual areas. For this reason other organisations are having to consider the report, wrestle with the complicated and fragmented nature of the report and it's associated documents on line, share with others, explain the implications, consider their response and finally attempt to submit it using complicated on line forms.

Given that the consultation has taken place over the festive period the whole process feels deliberately time compressed to minimise negative responses.

Developers profits considered more important than the views of residents

Compilation of the plan has been based upon the willingness of developers and landowners to build upon agricultural ground and make significant profits. It is not founded on the views of residents. The views of residents are the last factor to be considered and only in terms of small refinements rather than the founding basis.

In Lympstone Parish the wishes of residents have not been considered at all. The neighbourhood plan has virtually been relegated to a footnote that planners have brushed aside dismissively.

Lympstone's Neighbourhood Plan delivered on an ambition to provide organic sustainable growth. The plan, put together in consultation with EDDC, has been obliterated and consigned to the bin. The philosophy of working with communities and finding ways forward together was excellent and started to engender some trust in EDDC but this plan has shown that to be a lie and a sham.

I would expect East Devon District Council to consider the needs of residents and visitors before the need of developers. This is clearly not the case.

Standing up for the wellbeing of residents

There is no desire from the residents of East Devon for such large scale growth and the plan shows no evidence of any need – the reason provided by EDDC politicians and planners is that the government has set targets. It is embarrassing to see politicians avoid responsibility for their decisions and do anything but stand up to government and tell them what should be done.

I think it is reasonable for the electorate to expect East Devon District Council to stand up for the needs and views of residents - even if this means challenging government policy. This has not happened, views of residents are only being taken into account after those of developers.

EDDC accepts without question government targets. It is to be hoped that as the government is likely to remove such mandatory targets, EDDC will have a major rethink and consult with residents on how to grow and improve their communities in a sustainable, environmentally friendly way.

Failure to spread the burden of development evenly

The plan is called the East Devon Development Plan and yet the development proposed is largely based in the West of East Devon.

A new town is proposed and Lympstone Parish is to be destroyed by a disproportionate share of East Devon's development, despite insufficient infrastructure either in place or proposed.

Meanwhile, places such as Sidmouth and Budleigh Salterton are virtually devoid of any additional development pressures. I am not recommending that they suffer but

would rather ask that the reluctance of planners to destroy the surroundings of Sidmouth and Budleigh should also be applied to all development sites planned for Lypstone Parish.

The plan suggests that major centres of population will have the most significant development. This is totally wrong with most of Exmouth's development being pushed into the Lypstone Parish.

The plan protects Sidmouth and the surrounding area whilst destroying the health and wellbeing of those who currently live in and visit Lypstone Parish.

I agree with our MP Simon Jupp who summed up the situation when he stated:

“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 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”. **Simon Jupp - MP - East Devon**

Sustainability report bias

It appears that in the sustainability report there is a bias (conscious or unconscious) to find reasons to develop Lypstone. When compared with similar sites elsewhere the decision is Lypstone is suitable for development whilst elsewhere the same situation results in a rejection. For example, in some locations the lack of a secondary school in the vicinity is given as a negative whilst in Lypstone it is ignored. Lypstone is told “Development would not adversely impact heritage assets or their settings” yet in Budleigh Salterton the proposed outskirts development has been said to impact on the heritage assets and so dropped. These are examples of the many inconsistencies that exist about the comparison of sites.

In the sustainability report regarding access to services, the report considers it to be positive based on bus services. As EDDC may or may not be aware bus services to and from Lypstone have recently been cut. The sad reality for residents of Lypstone is that car use is essential, primarily on the A376, which is already stretched beyond its limits. In more recent developments on the outskirts of Lypstone, residents even have to use their cars to travel to the train. However there is no parking. The infrastructure cannot cope with the current levels of housing. To add a further 500 homes without major changes is planning for failure

In the sustainability report commentary on Connectivity and transport it suggests that it is judged to be 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.

The Local plan uses ‘as the crow flies’ measurements’ for measuring distances to facilities. Unfortunately reality does not match up to the planner's ideals. Previous

planners have failed to provide interconnecting paths or cycle paths and therefore true distances are considerably higher than those stated.

EDDC claim that one of the reasons locations were picked was because of their proximity to employment. There is minimal employment in Lympstone. I put this to one of the planners at an open evening and it was stated that the sites will be big enough to host some employment opportunities. This would be laughable if it were not so serious. Experience has shown that where EDDC claim that employment, shops, schools and new roads will be provided they seldom if ever appear. However the houses, profit, people and pressure on infrastructure do arise to the detriment of existing and new residents. An example of this is the Goodmores site, where a school and road were to be provided but all that has appeared is added pressures for local residents.

Lympstone suffering because of EDDC land-bank failures

EDDC councillors and the planners have made it clear that much of the need for the plan stems from the fact that EDDC has failed to provide a 5-year land bank.

I have personally been present at meetings when both planners and EDD councillors have advised that I and other consultees must agree to some of the proposed sites or the developers will get free rein – because of the process where developers and government can ignore EDDC plans if there is not a five-year land bank. This is a clear statement that EDDC incompetence is exposing us to the risk of unsustainable development that destroys our environment.

Presentation of the development relating to Lympstone Parish

The report fails to provide the residents of Lympstone Parish with a true picture of the extent of the proposed development. The maps and figures are never attributed to Lympstone Parish. The same applies to other areas.

I appreciate that EDDC want to redraw settlement boundaries but to be fair to residents it should explain what is happening in the existing Parish. To comment on the future, residents should know what currently exists. This is not shown.

The figures provided and the maps are in different locations making it difficult for readers of the report to understand and consider the true impact. Maps should have been annotated with housing numbers; something that would have been easily achieved. However it is not done.

By not showing all development sites in Lympstone Parish on the same page, it appears you have decided to change or disregard Parish boundaries. As a local authority representing the people of East Devon you should understand that it is important to the people who live in the Parish and that they have the right to be consulted on their boundaries being redrawn. You should be the champion of residents rights, not the destroyer.

The importance of AONBs as compared to Coastal Preservation Areas and Green Wedges. Policy and Proposals.

At a consultation meeting I attended it was explained to me that the reason for very little development in places such as Sidmouth and Budleigh, despite there being some obvious areas upon which to build, was the AONB. I was told that Lypstone's protections were afforded by the Coastal Preservation Area and the Green Wedge and that they did not really matter because they, EDDC, had the powers to change them – in effect making them irrelevant.

The Coastal Preservation areas and Green Wedges deserve protection. If they are worthy of being designated as a Coastal Preservation Area or Green Wedge then they should not be changed because a landowner is willing to sell their land for houses. This is fundamentally wrong and it is shameful that EDDC disregard these designations but honour AONB status. Lypstone's environment deserves better.

Changes to the Green Wedge or Coastal Preservation Area should not be hidden within the Local Plan consultation where it is being disregarded by EDDC as an inconvenience.

It is laughable and sad that you outline your policy on Coastal Preservation Areas stating that they will not be changed or built upon. Although your next paragraph says that this plan can ignore such restrictions. In Lypstone that is exactly what you are doing. To residents it appears that you are making and breaking rules at will.

Recent Government Inspectors observations and implications for Lypstone

In a recent refusal by the government planning inspectorate for a single house in the parish, the main reason was "disparity with development in Lypstone Parish and/or settlement and the rest of East Devon. Lypstone is being removed from the map and being merged." In the eyes of government, the existence of Lypstone was threatened by one house.

On this basis, the building of 500 houses on the green spaces surrounding Lypstone Parish would not only hasten it being swallowed up by Exmouth but destroy much of the precious environment that we need to protect for generations to come.

Specific objections against each site in Lypstone Parish

LYMP_01 Underhill Crescent – 14 houses

This development will have a huge negative impact on the health and wellbeing of Lypstone Parish residents.

The current infrastructure struggles to cope and schools, GPs, roads, public transport, flooding and drainage will be negatively impacted upon. 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 and the Coastal Preservation Area will be built upon and permanently lost – this directly contradicts your proposed policy.

The green wedge between Lympstone and Exmouth will be seriously eroded, which 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.

GH/ED/72 Land between Nutwell and Meeting Lane – 131 houses

This development will have a huge and 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 impacted upon. 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.

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GH/ED/73 Land North West of Strawberry Hill – 46 houses

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

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The development will have significant negative effects on the environment.

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GH/ED/75 Land off Grange Close - 6 houses

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Land will be lost and the Coastal Preservation Area will be built upon and permanently lost – this directly contradicts your policy.

The development will have significant negative effects on the environment.

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

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LYMP_07 Courtland Cross – 100 houses

This development directly contradicts the findings of the government inspector who refused the building of a single house in this area. It is a very serious threat to the identity of Lympstone.

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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

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Conclusion

The process and the report appear to be the result of a convenient partnership between EDDC officers and developers. The health, well being and quality of life of Lymptstone residents, and of those in the west of East Devon, has been disregarded. The result is a report that erodes trust and leaves residents feeling ignored, disheartened and helpless

My plea is that EDDC, and in particular the elected members, now stand up and champion the rights of those who live and work in East Devon. Listen to the views of communities whose wishes are captured in neighbourhood plans. Protect our Coastal Preservation areas and Green Wedges as they exist now and value our precious environment.

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 Lymptstone 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.