

Filtered Data Export

**Full name:** Lucy Tyrrell

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

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

-

**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

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** We believe that the new plan, if adopted, has used unsound reasoning and logic and does not satisfactorily address several strategic policy points. The consultation process itself has been flawed in several aspects and most importantly because it enables Tier 1 targets 'higher levels of development' for Exmouth by classifying Lympstone as a Tier 3 settlement (Lympstone; 'moderate levels of development') changing settlement boundaries and early documentation in the process that did not recommend development to accommodate this (Appendix E). Lympstone's Spirit of Place will cease as a result of the Tier placement imposed on us and Lympstone will become a suburb of Exmouth. This cannot be a legitimate or sound outcome for a new plan to shape our district and lives for the next twenty years.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** Members of Lympstone Parish Council who are willing to attend the hearing in person are Cllr Lisa Staddon, Cllr Susie Culhane and Cllr Susan Francis.

**Full name:** Lucy Tyrrell

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

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

-

**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

**2. Do you consider that this part of the Introduction chapter is legally compliant?:**

No

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** Throughout the entire process of the development of the new Local Plan, EDDC has used Commonplace Portal and Technology as their preferred method of consultation. They have also given the opportunity to respond directly by email or letter which has been appreciated as the Commonplace software is difficult to use and navigate. Residents have had difficulty using it and indeed a tutorial was posted on how to use it by a resident as the process was so frustrating. Now we have reached the Regulation 19 stage it is once again the preferred method. There are no clear settlement allocation maps within the PDF document. The new interactive Policies map is unclear, and difficult to understand. The use of coloured dotted and dashed areas makes it very difficult to visualise where housing allocations are proposed. It is not possible to search by settlement, parish or town, and the Green Wedge layer is the same colour as the Housing allocation. This is not a clear, transparent, or accessible means of consultation. Even during the EDDC introductory webinar on 6th February 2025 when the consultation and its process was explained to Councillors, the member of the planning team demonstrating the interactive element had difficulty navigating it to show its layers. If the chosen means of consultation throughout the process has been and continues to be so non user friendly, can the whole process really be judged as sound? There have been concerns that the whole process of Consultation has just been a tick box exercise and site allocation rushed to ensure that the Plan could move ahead with the lower centrally imposed housing figures. While, of course, trying to achieve all the necessary processes is desirable to save having even more development and one which

we think is generally supported, Parishes can be forgiven for questioning the consultation aim. Is the process to genuinely listen to concerns and address them in the policies and final adopted Plan, or to simply go through the required statutory stages?

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

-

**Full name:** Lucy Tyrrell

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

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

-

**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR01

**3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:** Walking and wheeling as a priority is not possible safely in Lympstone where the roads are predominantly Devon lanes with no pavements, and the A376, which splits the parish in two. Bus services to Lympstone are limited, and do not carry passengers to the rail station. The sustainability appraisal and site selection process which defines a sustainable location as being a 20 minute walk, does not take into account public safety i.e. no pavements on the majority of our roads. (reference Appendix B, and photos 2 and 3 above).

**Full name:** Lucy Tyrrell

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

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

-

**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.:** SP01

**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.:** This is of particular concern to our response. The Parish Council on behalf of residents, and residents individually have challenged this designation in consultations. Lymestone has been designated a Local Centre, defined as “settlements with reasonable population levels, and a smaller but important selection of strategic and local facilities”. Lymestone accepts that it must under the new plan have some new development, and identified 4 proposed sites out of those put forward where development could take place and the village still retain its identity and Spirit of Place. Lymestone has always questioned and challenged its designation as a Tier 3 settlement. The background evidence paper initially placed it in the village category (see Appendix A) but it was elevated to Tier 3 because of the train station. The train station has only 13 car parking spaces (see photo 1 below); bus services to Lymestone are limited, and do not carry passengers to the rail station, stopping instead at the Northern extremity of the village, a 20 minute walk to the train station (see Appendix B). People will not walk from the outer fringes of the village to the station, nor is it possible to do so safely, as there are no pavements on our lanes (see photos 2 and 3 below). The walking distance from the closest bus stop to Lymestone Village train station is 0.6 miles (source: Google Maps), and proposed developments are even further away. In all other respects, Lymestone is a small village of some 900 houses and 2,000 residents, with one shop, a cafe and 3 pubs. Exton, the next village along the Avocet Railway Line, has a train station and similar amenities - shop, pub, village hall and church. It is also served by the same bus route as Lymestone but is not designated in the same tier. We question why the criteria used to place Lymestone as a Tier 3 settlement have not applied to Exton. In addition to the justification of a railway station resulting in the tier placement and housing allocation, we feel it appropriate to draw your attention to the Avocet Line Railway Users Group assessment. This states

that in order to meet the extra demands such expansion would bring, would necessitate longer trains and therefore increased platform lengths. Can a plan be judged sound when such practicalities of its conclusions are glossed over? As a Local Centre (Tier 3), Lympstone has a minimum housing requirement of 323, equivalent to a 36% increase in housing. In comparison, Budleigh Salterton, with a population of 5,420 has a minimum housing requirement of 132; and the town of Sidmouth, with a population of 14,377 has a minimum housing requirement of 471. This undermines the categorisation and the basic philosophy of the plan, that of allocating sites to higher tier settlements. The criteria being used and applied by the Planning Team at EDDC seem illogical, especially when the larger town of Budleigh Salterton is tiered alongside Lympstone. How can the new plan be seen to be fair, and the processes for the decisions reached on each placing and housing requirement be seen to be sound with these allocations? Lympstone has consistently challenged its categorisation as a Tier 3 settlement, as evidenced in our previous consultation responses and in initial discussions with EDDC planning team on a new neighbourhood plan where Angela King EDDC Planning Officer states she will feed our views back to her colleagues (see Appendix C: EDDC first Regulation 18 consultation Lympstone 7-11-22 to 15-01-23).

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** We request the following modification: Reinstate the Tier 4 categorisation for Lympstone in the hierarchy of settlements.

**Full name:** Lucy Tyrrell

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

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

-

**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.:** SP05

**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.:** The settlement boundaries defined by the Policies Map have been changed both to the north and south of Lymptstone's historic boundary. Lymptstone's historic boundary is clearly marked by boundary stones and a long-held village tradition of 'Beating the Bounds' can be traced back to at least the nineteenth century. This change has been made without consultation or discussion. These changes significantly impact the housing allocations of the plan and in determining the spatial strategy, the impact on neighbouring communities has not been considered. Example A Lymp\_07 (Courtlands) is within Lymptstone parish, on the Lymptstone side of the green wedge, yet has been allocated to Exmouth. Lymp\_07 should be allocated to Lymptstone, for residential, commercial and recreational purposes. This is of particular importance because its inclusion within the settlement boundaries of Exmouth totally overrides a previous Inspectorate decision at Public Enquiry that found, to prevent coalescence, a distance of 450m should separate the two communities. Even EDDC's early documentation referred to in our response at the first Strategic Planning Site selection was changed to facilitate site selection (Appendix D: Response for SPC meeting Lymp07.docx). How can this be sound practice? Example B During the Reg 18 consultation phase and subsequent site selection process, site GH/ED/72a was within Woodbury parish. This site was discounted for Woodbury because it did not meet the spatial policy requirements, being totally separate and distanced from Woodbury centre. Then the site was allocated for consideration. Lymptstone Parish Council requested to be allowed to comment on this during the site selection process as the full impact of the development would be felt in Lymptstone. The Strategic Planning Committee refused to allow this request. Now at Reg 19, the site has been allocated to Lymptstone, without any prior notice or discussion. Can this be regarded as sound when consultation on GH/ED/72a has been highly

questionable to say the least and the subject of formal complaint (Stage 1 ref 657909870, Stage 2 complaint Iken ref 003227). There is also a question whether the site selection complies with Nolan Principles and Rules: the land owner Mr S Parkes is a Woodbury Parish Councillor, which could indicate a conflict of interests. The site was discussed as part of Woodbury, put forward by Woodbury and allocated to Woodbury, but at this last Regulation 19 stage, is now in...Lympstone!

**Full name:** Lucy Tyrrell

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

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

-

**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.:**

Compliance with the National Planning Policy Framework (NPPF, revised 12 December 2024) The plan does not enable the delivery of sustainable development in accordance with the NPPF, specifically paragraph 8, which defines three interdependent and mutually supportive objectives - economic, social and environmental. 8 a) an economic objective - “to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;” The plan does not identify sufficient land of the right type in the right place, nor does it identify or coordinate the provision of infrastructure. All the development in Lympstone is proposed to be located on agricultural land, which will impact the local economy. No new transport connections or infrastructure improvements sufficient to support the increase in population are planned. b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and The Plan does not meet the social objective of ensuring a range of homes to meet needs. Lympstone parish requires 2-3 bedroom starter homes, ‘affordable’ for a young family on an average Devon salary, so that youngsters growing up in the area can remain here; as well as bungalows which meet the downsizing needs of our older population. The planning applications we have seen to date do not meet this housing requirement (3 bungalows are offered at GH/ED/72a). Services are at capacity, Lympstone’s GP surgery

is full, ECC secondary school in Exmouth is full, therefore secondary school students will have to travel to Exeter. The A376 is the only A road between Exeter and Exmouth. No new bus or road routes to Exeter are planned, nor any upgrade to carriage stock on the ALRUG railway line. c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.” Biodiversity net gain improvements are not able to be fully met on development sites in Lympstone due to the high existing biodiversity value of the land. Waste and pollution will increase as there is no evidence of water quality risk assessments for any of the sites - despite water pollution being a critical issue in Lympstone which is located on the Exe Estuary, a SSSI and RAMSAR site. Water quality here in Lympstone is intrinsically linked to flood risk, biodiversity, human health, and the local economy (tourism and shellfish business in Lympstone).

**Full name:** Lucy Tyrrell

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

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

-

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC01

**3. Do you consider that this part of the Mitigating Climate Change chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:** transparent calculation of the carbon cost of development must be included, along with sustainable travel options, and measures to reduce car dependency quantified. Without these important elements, this policy is not based on solid evidence.

**Full name:** Lucy Tyrrell

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

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

-

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC02

**3. Do you consider that this part of the Mitigating Climate Change chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:** The policy description contradicts the title. "All developments will be required to demonstrate... that minimising the carbon footprint of the proposed development has informed the design and layout..." Minimisation is not the same as net-zero.