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Exmouth Neighbourhood Plan – Submission Version Representation Form



The Exmouth Neighbourhood Plan has been prepared by Exmouth Town Council. It has now been formally submitted to East Devon District Council who are legally required to undertake public consultation.

Please return this form to East Devon District Council by Wednesday 17 October 2018. Representations received after this time will not be accepted.

Part A – Personal Details Please note we cannot accept anonymous responses.

Personal Details	
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	Bourne Leisure Limited
Address	
Postcode	
Tel. No.	
Email Address	

Agent's Details (if applicable)*	
Title	
First Name	Helen
Last Name	Ashby- Ridgway
Job Title (where relevant)	Associate Director
Organisation (where relevant)	Lichfields
Address	Helmont House Churchill Way Cardiff
Postcode	CF10 2HE
Tel. No.	
Email Address	

*If an agent is appointed, please fill in your title, name and organisation and the full contact details of the agent. Where an agent is used the agent will be the point of contact for correspondence.

Name/Organisation Please complete for each sheet	Bourne Leisure Limited
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Please indicate whether you wish to be notified of any of the following (delete as appropriate):

The publication of the recommendations of any person appointed to carry out an independent examination of the Exmouth Neighbourhood Plan. Yes

The adoption of the Exmouth Neighbourhood Plan. Yes

Representation details

Please use a separate form for each representation

1. **To which section of the Neighbourhood Plan does this representation relate?**
(Please note that a separate form must be completed for each representation)

Policy Number (Include policy, paragraph or other reference no. if appropriate)	Policy EN5
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2. **Please use the box below to set out why you are supporting or objecting to this part of the plan.** If your comment relates to a specific area of land or site if possible please identify it on a map. Continue on a separate sheet if necessary

The Submission Version Draft NP states at Policy EN5:

“The impact from any additional surface water resulting from development should be controlled and satisfactorily mitigated and should not cause any adverse impact to neighbouring properties or the surrounding environment, wildlife habitat and river and sea water quality. A drainage impact assessment will be required for all new development with potentially significant surface run off implications.”

Bourne Leisure welcomes the requirement of the drainage impact assessment for all new development with “*potentially significant surface run off implications*”, rather than requiring a Flood Risk Assessment for development proposals for “*permeable land*” (within the Pre-submission version of the NP).

However, the requirement of the drainage impact assessment will need to align with the National Planning Policy Framework (NPPF, 2012) (if final submission of the NP is before the 24 January 2019 deadline), for the preparation of flood risk assessments at paragraph 103 and footnote 20. Footnote 20 states:

“A site-specific flood risk assessment is required for proposals of 1 hectare or greater in Flood Zone 1; all proposals for new development (including minor development and change of use) in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has critical drainage problems (as notified to the local planning authority by the Environment Agency); and where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding.”

The criteria defining the flood Zones are provided in the PPG.

Furthermore, The East Devon Local Plan (adopted January 2016) sets out the local planning authority's approach to managing flood risk through a sequential approach, and if necessary, an exceptions test (Policies EN21 and EN22), which is consistent with the NPPF.

Name/Organisation

Bourne Leisure Limited

Please complete for each sheet

3. What changes would you suggest should be made to the plan?

It will be helpful if you are able to put forward your suggested revised wording of any policy or text or suggested alternative policy boundary. Please be as precise as possible.

In consideration of the relevant planning policy identified, Bourne Leisure notes that the requirement of the drainage impact assessment should be proportionate to the context, scale and type of proposals. Thus, Bourne Leisure proposes the following amendments:

“The impact from any additional surface water resulting from development should be controlled and satisfactorily mitigated and should not cause any adverse impact to neighbouring properties or the surrounding environment, wildlife habitat and river and sea water quality. A drainage impact assessment will be required for all new development with potentially significant surface run off implications, with considerations of proportionality for context, scale and type of proposal.” (proposed amendments underlined)

Continue on a separate sheet if necessary

4. If your representation is seeking a change, do you consider it necessary to speak at the examination?

Please note this will not be regarded as a binding decision but will help us in our planning.

If you select No your representation(s) will still be fully considered by the independent examiner by way of written representations.

I wish to speak at the examination: No (delete as appropriate)

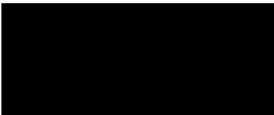
Name/Organisation Please complete for each sheet	Bourne Leisure Limited
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5. If you wish to speak at the examination, please outline why you consider this to be necessary:

N/A

Please note the examiner will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination. If the examiner does not consider it necessary to hold a public examination consideration will be given by way of written representations.

Data Protection- Any personal information which you provide will be held and used by East Devon District Council for the purpose of producing the neighbourhood plan and may inform other Planning Policy work. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the relevant Privacy Notice which can be accessed at <http://eastdevon.gov.uk/privacy>.

Signed	
Date	17-10-2018

A signature is required by the Planning Inspectorate. If filling in the form electronically it can be an ‘electronic signature’ by typing in your name in the box. If you provide a handwritten signature we will ensure that it is not published on-line but it will be visible on the paper copies available at our offices and sent to the examiner.

Please e-mail the completed form(s) and any additional information to planningpolicy@eastdevon.gov.uk or send to Phil Twamley, Planning Policy Section, East Devon District Council, The Knowle, Sidmouth, EX10 8HL