



Intelligent Plans
and examinations

Report on Exmouth Neighbourhood Plan 2018 -2031

An Examination undertaken for Exmouth Town Council with the support of the East Devon District Council on the August 2018 submission version of the Plan.

Independent Examiner: Jill Kingaby BSc (Econ), MSc, MRTPI

Date of Report: 31 December 2018

Intelligent Plans and Examinations (IPE) Ltd, Regency Offices, 37 Gay Street, Bath BA1 2NT

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

Contents

	Page
Main Findings - Executive Summary	3
1. Introduction and Background	3
• Exmouth Neighbourhood Plan 2018 – 2031	3
• The Independent Examiner	4
• The Scope of the Examination	5
• The Basic Conditions	6
2. Approach to the Examination	6
• Planning Policy Context	6
• Submitted Documents	7
• Site Visit	7
• Written Representations or Public Hearing	8
• Modifications	8
3. Procedural Compliance and Human Rights	8
• Qualifying Body and Neighbourhood Plan Area	8
• Plan Period	8
• Neighbourhood Plan Preparation and Consultation	9
• Development and Use of Land and Excluded Development	9
• Human Rights	9
4. Compliance with the Basic Conditions	10
• EU Obligations	10
• Main Issues	10
• Matter 1- Whether the Plan is sufficiently positive and supportive of sustainable development	10
• Matter 2 - Whether the specific policies of the Plan, set for each of the Plan’s six themes, meet the Basic Conditions.	12
• Chapter 1 - The Natural Environment	13
• Chapter 2 - The Built Environment	15
• Chapter 3 - Economy & Employment	17
• Chapter 4 - Housing	19
• Chapter 5 - Getting about	20
• Chapter 6 - Community Facilities	21
• Conclusions on Matter 2	21
5. Conclusions	22
• Summary	22
• The Referendum and its Area	22
• Overview	22
Appendix: Modifications	23

Main Findings - Executive Summary

From my examination of the Exmouth Neighbourhood Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Exmouth Town Council;
- The Plan has been prepared for an area properly designated – Exmouth Town, as shown on Figure 1 of the Neighbourhood Plan;
- The Plan, with modifications, specifies the period to which it is to take effect – 2018-31; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to Referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Exmouth Neighbourhood Plan 2018 - 2031

- 1.1 Exmouth is the largest town in Devon, albeit it is a smaller settlement than the cities of Plymouth and Exeter, and the Torbay unitary area of Torquay, Paignton and Brixham. Exmouth currently has a population of about 36,000. Its tourism industry took off in the early nineteenth century when the Napoleonic Wars limited access to the Continent of Europe for wealthy travellers. The advent of the railway to Exmouth in the 1860s boosted the town's attractiveness for visitors, giving easy access to Exmouth's lengthy sandy beaches. Evidence of Georgian and Victorian development remains in the heart of the town and close to the seafront. The distinctive and historic character of much of the central area is recognised by Conservation Area designations, as shown on Figure 10 of the Neighbourhood Plan. Hotels, bed and breakfast accommodation, the Devon Cliffs Holiday Park and harbour/marina area indicate that tourism remains a major feature defining Exmouth and shaping its local economy. Exmouth is also a regional centre for water sports.
- 1.2 In addition to tourism, the town's dockyard, handling imports of coal, timber and apples, and the fishing industry, contributed to growth in the

Victorian era. In recent decades, Exmouth has developed as a commuter town for people employed in Exeter, some 11 miles away. The 2011 Census indicated an economically active population of 14,500 people in Exmouth, of whom about 6,500 commuted to jobs elsewhere, mostly in Exeter.¹ Exmouth was shown to be the largest retail centre in East Devon in 2011², and its town centre contains many well-known stores and independent shops, as well as cafes and other outlets. The purpose-built Magnolia Centre was added to the town centre in the 1970s, and it has extended the range of shops on offer. Other commercial and business development exists across Exmouth, notably along Salterton Road in the south-east.

- 1.3 Exmouth is bounded on its western side by the River Exe and on its southern border by the sea. The Exe estuary is a designated Ramsar site, Special Protection Area (SPA) and Site of Special Scientific Interest. These designations denote its international and national importance for wildlife. Part of Exmouth's coastline, as illustrated in Figure 2 of the Neighbourhood Plan, is included in the Jurassic Coast, a World Heritage Site of importance to natural history. The East Devon Area of Outstanding Natural Beauty (AONB), designated because the landscape is of national importance, extends into the southern and eastern parts of Exmouth as shown on Figure 3. East Devon's Local Plan has defined a green wedge between Exmouth and Lympstone to the north, as well as Valley Parks at Bapton and Withycombe, where green corridors should be protected and enhanced. Exmouth's location at the mouth of the River Exe means that it is at risk of flooding from fresh and sea water. Figure 9 of the Neighbourhood Plan indicates that parts of the town lie within floodzones 2 and 3. Overall, Exmouth has a rich and varied range of landscape and natural features which will require care and attention when any new development is proposed.
- 1.4 The Neighbourhood Area was approved for designation for neighbourhood planning purposes on 30 June 2015. Exmouth Town Council set up a Neighbourhood Plan Steering Group in October 2015, which included town councillors from each of the 5 wards, as well as community representatives and other stakeholders. The Steering Group approved a Consultation and Engagement Strategy in December 2015, so that the community and stakeholders could be involved in the process of plan preparation and development which took place between 2016 and 2018.

The Independent Examiner

- 1.5 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Exmouth Neighbourhood Plan by East Devon District Council, with the agreement of the Exmouth Town Council.

¹ East Devon Local Plan 2013-31 paragraph 10.3.

² East Devon Local Plan 2013-31 paragraph 10.1 and GVA Grimley East Devon Retail Study – Update 2011.

- 1.6 I am a chartered town planner and former government Planning Inspector, with experience in examining neighbourhood plans. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.7 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.8 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:
- Whether the Plan meets the Basic Conditions;
 - Whether the Plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the Local Planning Authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development';
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
 - whether the referendum boundary should be extended beyond the designated area, should the Plan proceed to referendum; and
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

1.9 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.10 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the Exmouth Neighbourhood Plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations; and
- Meet prescribed conditions and comply with prescribed matters.

1.11 Regulation 32 and Schedule 2 to the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.³

2. Approach to the Examination

Planning Policy Context

2.1 The Development Plan for this part of East Devon District Council is the East Devon Local Plan 2013-31, adopted in 2016, and the Villages Plan which was adopted on 26th July 2018. Devon County Council sought references to be made in the Exmouth Neighbourhood Plan to the Devon Minerals Plan and Devon Waste Plan, as these form part of the development plan for the area. However, I consider this to be unnecessary as the legislation for neighbourhood planning is clear that documents relating to minerals and waste development are excluded⁴.

³ This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

⁴ Section 61K of the Town and Country Planning Act 1990 (as amended).

Intelligent Plans and Examinations (IPE) Ltd, Regency Offices, 37 Gay Street, Bath BA1 2NT

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 24 July 2018, replacing the previous 2012 NPPF. The transitional arrangements for local plans and neighbourhood plans are set out in paragraph 214 of the 2018 NPPF, which provides 'The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019'. A footnote clarifies that for neighbourhood plans, 'submission' in this context means where a qualifying body submits a plan to the local planning authority (LPA) under Regulation 15 of the 2012 Regulations. The Plan was submitted to East Devon District Council on 29 August 2018. Thus, it is the policies in the previous NPPF that are applied to this examination and all references in this report are to the March 2012 NPPF and its accompanying PPG.

Submitted Documents

2.3 I have considered all policy, guidance and other reference documents relevant to the examination, including those submitted which comprise:

- the submitted Exmouth Neighbourhood Plan [August 2018];
- Figure 1 of the Plan which identifies the area to which the proposed neighbourhood development plan relates;
- the Consultation Statement [August 2018];
- the Basic Conditions Statement [August 2018];
- all the representations that have been made in accordance with the Regulation 16 consultation; and
- the Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) – Final Screening Report prepared by East Devon District Council, February 2018.

I raised preliminary questions about the submitted Plan in November 2018 at the start of the examination. The letter from Exmouth Town Council, dated 28th November 2018, which also includes shared responses from the Town Council and East Devon District Council, has contributed to my examination of the Plan, along with the Town Council's letter of 13th December 2018 clarifying outstanding matters.⁵

Site Visit

2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 12 November 2018 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

⁵ View at: <http://eastdevon.gov.uk/planning/neighbourhood-and-community-plans/neighbourhood-plans/neighbourhood-plans-being-produced-in-east-devon/exmouth/#article-content>

Written Representations or Public Hearing

- 2.5 This examination has been dealt with by written representations. I had regard for McCarthy & Stone Retirement Lifestyle's Limited's wish to speak at a hearing session. However, I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan, and presented arguments for and against the Plan's suitability to proceed to a referendum.

Modifications

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Exmouth Neighbourhood Plan has been prepared and submitted for examination by Exmouth Town Council which is a qualifying body for an area that was designated by East Devon District Council on 30 June 2015.
- 3.2 It is the only neighbourhood plan for Exmouth, and does not relate to land outside the designated Neighbourhood Plan Area. Figure 1 in the Neighbourhood Plan indicates that the Built Up Area Boundary (BUAB) for Exmouth, as defined in the East Devon Local Plan, includes a portion of land to the north which is outside the Exmouth Town Boundary and within the neighbouring parish of Lympstone. Paragraph 2 on Page 11 of the Neighbourhood Plan clarifies that it (ie. the Plan) only applies to land within the designated Neighbourhood Plan Area. I have seen and read nothing to contradict this statement.

Plan Period

- 3.3 The Plan does not specify clearly the period over which it is to take effect. However, in response to my preliminary questions of 19th November 2018, Exmouth Town Council confirmed that the Neighbourhood Plan should apply from 2018 to 2031. I propose that the title page and introduction should be modified, as in **PM1**, to make this clear and satisfy Regulation 38B(1)(a) of the 2004 Act.

Neighbourhood Plan Preparation and Consultation

- 3.4 In December 2015, the Steering Group agreed its Consultation and Engagement Strategy to guide plan preparation. Engagement with the community stakeholders, local organisations, businesses, landowners and residents began in 2016, through written material and online procedures, face-to-face meetings and public consultation events. The Consultation Statement accompanying the submitted Neighbourhood Plan describes in chronological order how the community and stakeholders were involved in the process of plan preparation and development between 2016 and 2018. In April 2016, an open meeting at Exmouth Town Hall was attended by 130 people and was followed by ten meetings in different parts of the town, to identify and discuss key themes for the Neighbourhood Plan. A social media campaign in August and September 2017 was launched to increase engagement with young people and local businesses. The video presentation of the Neighbourhood Plan was viewed 17,000 times.
- 3.5 A wide range of events were held and various consultation techniques were used to engage local people in neighbourhood plan making. Key messages from consultees helped to develop and refine the Plan. Pre-submission consultation, in accordance with Regulation 14 of the 2012 Regulations, took place from February to April 2018. This elicited 43 responses from statutory bodies, local organisations and residents, which were considered and used to refine the Neighbourhood Plan before it was submitted for examination in August 2018. Sixteen respondents then commented on the submission version of the Exmouth Neighbourhood Plan at the Regulation 16 stage. Having read the Basic Conditions Statement and the Consultation Statement, I am satisfied that the Plan has been publicised in a manner likely to bring it to the attention of people who live, work or carry on business in the area. The Plan has met its legal requirements in this respect and it has had due regard to the advice on plan preparation and engagement in the PPG.

Development and Use of Land and Excluded Development

- 3.6 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act. It helpfully distinguishes its policies from (a) "strategic infrastructure projects" which would address the demands development may place on the area and may be eligible for funding from Community Infrastructure Levy (CIL) resources, and (b) "community actions" requiring initiatives by local people outside planning practice to help deliver the wider aspirations of the community. The Plan does not include provisions and policies for 'excluded development'.

Human Rights

- 3.7 East Devon District Council has not alleged that the Plan is likely to breach Human Rights (within the meaning of the Human Rights Act 1998).

Section 8 of the Basic Conditions Statement reports on an assessment of the Neighbourhood Plan in terms of the European Convention of Human Rights and concludes that the Plan will not have a discriminatory impact on any particular group of people. From my independent assessment, I see no reason to disagree.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The Exmouth Neighbourhood Plan was screened for SEA by East Devon District Council, which found that it was unnecessary to undertake SEA.⁶ The Neighbourhood Plan does not propose a level of development over and above that in the adopted East Devon Local Plan, which was itself subject to screening. Having read the Strategic Environmental Assessment Screening Report, I support this conclusion.
- 4.2 Exmouth Neighbourhood Plan was further screened for Habitats HRA, which also was not triggered. It concluded that the Plan was unlikely to have an adverse impact on a European site beyond that which has been identified in the earlier Local Plan. Natural England stated in its letter of 16 October 2018 (Regulation 16 consultation response) that it had no objection to the submitted Plan. From my independent assessment of this matter, I agree that HRA is not required.

Main Issues

- 4.3 Having regard for the Exmouth Neighbourhood Plan, the consultation responses, other written evidence and my site visit, I have approached the assessment of compliance with the Basic Conditions in terms of two matters:
- In general, whether the Neighbourhood Plan is sufficiently positive and contributes to the achievement of sustainable new development; and
 - Whether the specific policies of the Plan, set for each of the Plan's six themes, meet the Basic Conditions.

Matter 1- Whether the Plan is sufficiently positive and supportive of sustainable development

- 4.4 Paragraph 17 of the NPPF describes core planning principles, the first of which expects local and neighbourhood plans to set out a positive vision for the future of their area. Paragraphs 14 and 47 expect local planning authorities to positively seek development opportunities to meet the

⁶ Exmouth Neighbourhood Development Plan, Strategic Environmental Assessment and Habitat Regulations Assessment, Final Screening Report - Feb 2018.

Intelligent Plans and Examinations (IPE) Ltd, Regency Offices, 37 Gay Street, Bath BA1 2NT

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

development needs of their area, and boost significantly the supply of housing. Neighbourhood plans should have regard for the NPPF and contribute to sustainable development in order to meet the Basic Conditions. Exmouth is described in the Neighbourhood Plan as Devon's largest town, and Strategy 1 of the Local Plan expects towns to form "focal points for development to serve their own needs and the needs of surrounding rural areas". However, the Neighbourhood Plan's first policy, EN1, is designed to prevent development within the Marley area and Bystock House Estate. The first policy in the housing section, H1, was perceived by some readers as designed to restrict additional Care/Extra Care housing for elderly people. In view of these considerations, I asked the Town Council in my preliminary questions whether the Neighbourhood Plan was sufficiently positive and supportive of future housing development, having regard for the NPPF, the promotion of sustainable development and the requirement for the Neighbourhood Plan to be in general conformity with the strategic policies of the Local Plan.

- 4.5 I also had concern at the preliminary stage of examination that the Exmouth Neighbourhood Plan is vague about future development in Exmouth, as envisaged by Strategy 2 of the adopted Local Plan. That indicates that some 1,229 new dwellings should be provided between 2013 and 2031, and describes progress made up to September 2014. Strategy 22 allocates land at Goodmores Farm for mixed use development including 350 new dwellings. The additional information provided by Exmouth Town Council in response to my preliminary enquiry shows that development at Goodmores Farm is progressing and expected to deliver some completions in 2020/21. It also demonstrates that other sites, notably Plumb Park, are being developed and are expected to provide new homes in 2019 and beyond. I consider that the Neighbourhood Plan should set out how many dwellings have been completed or are in the pipeline, in order to confirm that it is in general conformity with Strategies 2 and 22 of the Local Plan, and is aiming to boost the local supply of housing as expected by the NPPF. As Devon's largest town, new housing provision within the BUAB to meet local needs should be provided; a commitment to do so would be consistent with contributing to the achievement of sustainable development.
- 4.6 I am highly aware of the constraints on significant new development which exist in Exmouth. These relate primarily to Exmouth's proximity to the sea and Exe Estuary (which limits land availability and means that some areas are at risk of flooding), as well as to the AONB and internationally important habitats. Exmouth includes a number of historic buildings and other features requiring protection. I also note the observation that gaps in social and physical infrastructure resulted from rapid housing development in the 1980s and 1990s, which need to be addressed before substantial new development takes place. I do not propose that the Plan supports unbridled growth in the town or beyond its boundary, but it needs to make a clear statement as to what level of development will be acceptable, and if possible where it should be focused, over the Plan period. I propose that the Introduction of the

Neighbourhood Plan is extended to state more positively what the Plan aims to achieve, based on its coverage on Page 13 of "Conforming to National and Local Policy, Sustainability and Vision". **PM2** should be made to add text, to give the Plan a more positive approach and meet the Basic Conditions. I shall also recommend modifications to Policies EN1 and the chapters addressing the Built Environment and Housing for the same reasons, as described under Matter 2 below.

- 4.7 The Exmouth Town Centre and Seafront Masterplan by LDA Design was prepared for East Devon District Council in 2011. Page 46, paragraph 14 of the Neighbourhood Plan, states that it is important that suggestions put forward in the Masterplan for enhancing specific areas of the town are retained. Paragraph 10.5 of the Local Plan stated that "The Local Plan will incorporate the key findings of the Masterplan work" and 10.9 informed that a new or refreshed Masterplan would be produced as a Supplementary Planning Document (SPD). However, the District Council advised me in response to my preliminary questions that the SPD would not be produced, although the regeneration aims were still supported. It seems to me that the Masterplan contains some detailed and potentially beneficial proposals for regeneration of the town centre and waterfront which should be taken forward.
- 4.8 I am aware that some of the waterfront schemes have proved controversial (Page 60, paragraph 24 of the Neighbourhood Plan affirms this). However, in my opinion, this strengthens the case for setting out the planning aims and expectations clearly, to secure high quality design, economic growth and a more attractive environment for local people, businesses and visitors. Reference to the Masterplan and the aim to promote improvements to the town centre and waterfront should be included in the modified Introduction, as in **PM2**. In view of the size of Exmouth, which includes 5 wards as indicated on Page 12 of the Plan, I consider it helpful for readers to include a map illustrating where those wards are located. I recommend that the Ward Map is added in **PM2**. With this modification, I conclude that the Exmouth Neighbourhood Plan will be sufficiently positive and supportive of sustainable development.

Matter 2 - Whether the specific policies of the Plan, set for each of the Plan's six themes, meet the Basic Conditions

- 4.9 The six themes were identified as important to the people of Exmouth from early public consultation on the Neighbourhood Plan by the Steering Group. I consider that they provide a clear structure for setting out the Plan's objectives, policies and actions and will greatly assist readers and users. I have examined the policies for each of the themes (or chapters) as set out below.

Chapter 1 – The Natural Environment

- 4.10 Paragraph 1 explains that respondents to public consultation exercises placed protection of Exmouth’s environment as the top priority. Following my site visit to the Town, I fully understand this position. Pages 20 to 23 of the Plan set out the key environmental characteristics of Exmouth and its surrounding area, and Figures 2 and 3 show important designations. Figure 1 shows the Exmouth BUAB as defined by the adopted Local Plan, and the text explains that there is a presumption against development in open countryside outside that boundary (Strategy 7 of the Local Plan). The Neighbourhood Plan states that a small adjustment to the BUAB had been considered in relation to the proposed Valley Park from Littleham to Maer Valley, but the Town Council did not find sufficient evidence to support an amendment. The text makes clear that the Neighbourhood Plan is not allocating any sites for housing development outside the BUAB. I support this section of the chapter for its clarity and general conformity with the strategic policies of the East Devon Local Plan. However, I consider that the final sentence of paragraph 5 on Page 20 is misleading in its reference to Environmental Impact Assessment (EIA), which is a tool for plan-making rather than development management. **PM3** will remove this reference and is necessary having regard for national planning policy.
- 4.11 Page 24 addresses “Green Wedges” and explains why, despite public support for additional designations in Exmouth, the nominated areas should not be so defined. I agree that the main criterion for green wedges, to prevent the coalescence of settlements, would not be met in the four named cases. I also agree that green wedge designation should be made through the East Devon Local Plan rather than this Neighbourhood Plan. The District Council requested that the evidence base for the presence of rare wildlife species as described in paragraph 9 on Page 24 should be stated. The Town Council advised that the Ecological Appraisal by The Environmental Dimensional Partnership (EDP) (2014) was the source of this information. The paragraph should be modified to refer to it, as shown in **PM4**.
- 4.12 In response to criticism by East Devon District Council that Policy EN1 is overly restrictive, the Town Council put forward modifications to the policy and Figure 5. I support these modifications as set out in **PM5**. In addition, I propose to make clear that development will generally be supported within the BUAB of Exmouth. The supporting text in paragraph 6 on Page 23 should include a cross-reference to the Local Plan (Strategies 1, 2 and 6 as well as 22 and Policy E2 explain what would generally be acceptable). Paragraph 10 on Page 26 should also be modified so that it is consistent with the modified Policy EN1. **PM5** would include this additional information to ensure that Policy EN1 has regard for the positive approach to planning as set out in the NPPF, and will be in general conformity with the strategic policies of the Local Plan.

- 4.13 The protection of Green Spaces and Trees is addressed on Page 27, and I support the addition of a map illustrating the existing green spaces, as proposed by the Town Council. **PM6** should be made to give weight to the objective to retain existing green spaces, and thereby achieve sustainable development. Policies EN2 and EN3 of the Neighbourhood Plan concern Valley Parks. Bapton Brook and Withycombe Brook Valley Parks are identified on the East Devon's Policies Map accompanying the Local Plan, within which Policy EN2 resists development other than to provide a safe corridor for pedestrians, cyclists, disabled users and outdoor recreation. Initiatives to improve access to them and include adjoining open space will form part of Suitable Alternative Natural Green Space (SANGS) mitigation measures to relieve visitor pressure and adverse impacts on the Exe Estuary SPA and Pebblebed Heaths Special Area of Conservation. Policy EN2 of Exmouth Neighbourhood Plan supports the Local Plan policy, proposing extensions to both existing Valley Parks. The Environment Agency fully supports the policy, as do I, recognising that it is in general conformity with the strategic policy in the Local Plan and should contribute to sustainable development.
- 4.14 Policy EN3 seeking to define a new Littleham/Maer Valley Park also has the support of the Environment Agency. I consider that the policy in principle is in general conformity with Policy EN2 of East Devon Local Plan. However, the District Council expressed concern that the proposed Valley Park could be overly restrictive and conflict with use of Maer Road car park, the cricket ground, the Maer, tennis courts and play area. Figure 8 indicates that all would lie within the proposed Valley Park area. The Town Council put forward a modified Figure 8 with the BUAB which, as I propose in **PM6**, should replace the existing map. In addition, Policy EN3 should be re-worded, and new supporting text added together with an action statement to investigate the case for identifying future Local Green Spaces. **PM6** is necessary for general conformity with the Local Plan and to contribute to the achievement of sustainable development.
- 4.15 Pages 32-40 address a number of environmental issues which, in my opinion, will be very important for the future of Exmouth and its wider surrounding area. Creating and extending green corridors, working towards establishing Exmouth as a "Green Town" and setting up an Interpretation and Information Centre to promote greater awareness of environmental matters are the subject of ACTIONS NEA5, NEA6 and NEA7. Bourne Leisure Limited, which operates Devon Cliffs Holiday Park, requested that local stakeholders should have the earliest opportunity to engage and comment on any "Green Town" proposal to ensure that local businesses and future sustainable development are not constrained. I accept that ACTION NEA6 should be modified to enable such consultation. I also support modifications to paragraph 25 to omit the reference to "Solar panels ... for all new development", and to "outdoor lights ... switched off earlier" which could be unreasonably onerous and contrary to paragraph 173 of the NPPF. **PM7** should be made accordingly.

- 4.16 Bourne Leisure was also critical of Policy EN4 - providing for renewable energy, arguing that it does not provide protection for sensitive receptors such as residential or tourism accommodation, which could be vulnerable to noise and vibration. It is contended that Policy EN4 could harm the economic vitality of the tourism sector, contrary to East Devon Local Plan's policies. I agree that Policy EN4 should be modified to refer to mitigation to reduce any adverse impact on the amenity of residents or occupiers of holiday accommodation. Providing **PM8** is made, Policy EN4 will be in general conformity with the Local Plan's Strategy 33 and the achievement of sustainable development.
- 4.17 Figure 9 shows the extent to which parts of Exmouth are at risk of flooding. The text on Pages 36-39 discusses past incidents of flooding, the future risks from climate change, and ongoing work by the Environment Agency and East Devon District Council to secure upgrades in sea and estuary defences. The Environment Agency expressed support for Policies EN5, EN6, EN7 and EN8 of the Neighbourhood Plan and the related community ACTIONS to reduce the risk of flooding. I have considered the request from Bourne Leisure Limited that Policy EN5 be amended to emphasise that context, scale and type of proposal will be taken into account before drainage impact assessments are sought. However, I am satisfied that the policy gives sufficient flexibility and that site-specific features would be taken into account. I conclude that Policies EN5 to EN8 all meet the Basic Conditions.

Chapter 2 – The Built Environment

- 4.18 Most of this chapter describes the history of Exmouth and how it has developed throughout the nineteenth and twentieth centuries. I consider that the chapter should include a clearer statement as to what is expected to happen to the built environment over the Plan period, 2018-31. I have had regard for the Town Council's letter of 28th November 2018 which provided new information about the status of Exmouth Town Centre and Seafront Masterplan, as well as strategic allocations and other potential sites for housing or new development. This information should be added to the chapter, following paragraph 11 on Page 46, as worded in **PM9**. A number of sub-headings as follows should be used in this chapter:

- History of Exmouth's built environment;
- Future development;
- Regeneration of the town centre and seafront; and
- Conservation of heritage assets.

PM9 facilitates this re-structuring and is necessary having regard for the NPPF, the requirement to contribute to the achievement of sustainable development and the need to be in general conformity with the Local Plan.

- 4.19 Figure 10 maps the Conservation Areas in Exmouth, and the Objective on Page 47 refers to conservation areas and listed buildings. The Town

Centre Seafront and Masterplan, 2011, referred to three separate conservation areas:

- Louisa Terrace/The Beacon (designated in 1973)
- Bicton Street (designated in 1973)
- Albion Street/Windsor Square (designated in 1986)

Two additional conservation areas were designated in 2015, at the Town Centre and Seafront, and The Avenues. It would be helpful if Figure 10 named all conservation areas appropriately, and the Town Council agreed that a legend could be added to achieve this. Conservation areas and listed buildings are designated heritage assets. Development within and around them is subject to the Planning (Listed Buildings and Conservation Areas) Act 1990, and the NPPF, paragraphs 126-141, states that great weight should be given to their conservation. Paragraphs 132-135 make clear that there should be a hierarchical approach in development management, with permitted development likely to cause harm to or loss of heritage assets of the highest significance (eg. grade 1 or 2* listed buildings) being wholly exceptional. In the case of non-designated heritage assets, a balanced judgment will be required. The Town Centre Seafront and Masterplan showed listed buildings within the named conservation areas, in its Figure 2.3. It would greatly assist readers and users of the Neighbourhood Plan, in my view, if Figure 10 showed the designated listed buildings (albeit they will just appear as dots in clusters). A reference at the bottom of the map should also be added, as proposed by the Town Council, to refer readers to the website for listed buildings in Exmouth (128 in total). **PM10** should be made having regard for national policy.

4.20 Page 49 refers to a number of prominent buildings, and I consider that it is unclear how they have been selected, and whether they are all designated/listed. In its letter of 13th December 2018, the Town Council explained that lists were initially compiled by local historians. Following public consultation in 2017, the lists were amended and included in the Neighbourhood Plan. The East Devon Heritage Strategy 2018-31 was recently published for consultation. It advises that there is currently no formal list of undesignated assets in the District, but proposes that one be formed in the future. It seems to me that the work of local historians in Exmouth, as well as ACTIONs EBA2 and EBA3 encouraging work with local groups and improved public awareness of heritage, align with the aims of the emerging Heritage Strategy. I note that Devon County Historic Environment Team would be able to provide guidance and information on local heritage. The Town Council provided additional information as to the status of the named prominent buildings and residential areas of character, which I recommend should be appended to the Neighbourhood Plan. In addition, text should be included in Page 49 to clarify the status of these features, as in **PM10**.

4.21 The Objective on Page 47 of the Neighbourhood Plan is focused on the "conservation and enhancement of buildings ...", and it seems to me that

this overlooks the fact that many conservation areas have historic or architectural merit because of features such as landscaping, open spaces or building layout, not simply because of the quality of their buildings. I propose modifications to the Objective, as well as to Figure 10 and the text, so that regard is had for national planning policy on conserving and enhancing the historic environment. **PM10** should be made accordingly.

- 4.22 East Devon District Council proposed a modification to Policy EB1, as there is currently no guidance as to how historic street furniture might be identified. This would add a reference to the forthcoming "Exmouth Register of Historic and Architectural Features". I support the modification, as in **PM11**, having regard for national planning policy. The Plan's Policy EB2 seeks a high quality of design in new development which takes account of surrounding building styles. This is consistent with paragraph 56 of the NPPF in my opinion, as are the ACTIONS EBA1 – EBA3 which should help promote good design respecting the local historic environment.

Chapter 3 – Economy & Employment

- 4.23 Pages 54 to 56 provide a useful overview of the current state of the economy in Exmouth, citing Census data, the views of the Chamber of Commerce and the results of a Visitor Survey in 2016 (visitors' likes and dislikes). The chapter then sets out the Local Plan's vision for the future of Exmouth's economy and describes action already initiated to meet the vision. Pages 59-63 describe initiatives stemming from the Exmouth Masterplan for A. The Town Centre, B. The Estuaryside, C. The Seafront, D. The Queen's Drive Development and E. Orcombe Point. I applaud the Town Council for the clarity of the structure of this chapter, and its positive approach to building a strong, competitive economy as sought by the NPPF (paragraphs 18 onwards).
- 4.24 Bourne Leisure Limited suggested that a tourism policy should be added to the Neighbourhood Plan as tourism is acknowledged within the Neighbourhood Plan to be a major element in Exmouth's economy. Paragraph 10.6 of the Local Plan aims to promote the town as a high quality tourist destination, capitalising on the seafront assets. I note the Town Council's support for the addition of such a policy which, in my opinion, should contribute to the promotion of sustainable development and be in general conformity with the Local Plan. A new policy encouraging tourism should be added after paragraph 12 on Page 56, with some supporting text as set out in **PM12**.
- 4.25 Following the Objective to support the Local Plan vision for improving employment opportunities etc., the Neighbourhood Plan sets out a number of policies. I agree with the thrust of Policy EE1 that supports development proposals for an increase in workspace, although I consider that the policy's last sentence is overly restrictive. The words "wherever possible" should be added, so that proposals which could boost the local economy significantly but might occupy some undeveloped land are given

due consideration. **PM13** is necessary having regard for the NPPF, paragraphs 19-21, and the achievement of sustainable development.

- 4.26 Policy EE2 aims to limit the loss of employment sites to residential development, and is in general conformity with Strategy 32 of the Local Plan. East Devon District Council queried the need for Policy EE2. It pointed out that Strategy 32 is a comprehensive policy which resists the loss of employment, retail and community sites and buildings, and Policy EE2 offers no local specificity. However, as the retention of employment space is perceived locally as important to the town's future economic wellbeing, I support the retention of Policy EE2 to reinforce Strategy 32 of the Local Plan. Paragraph 14 on Page 56 lists the sites allocated for new commercial development in the Local Plan. Even if land at Redgate is currently the subject of a planning appeal for extra care accommodation, I see no need to modify the factual description as to the content of the Local Plan.
- 4.27 On behalf of Exeter Trade Frames Limited, objection was made to paragraph 15 which cites the Doyle Centre as a former employment site likely to be redeveloped for housing. It was stated that the Doyle Centre had been a day centre, under use class D1, not an employment use (B class). As I have seen no evidence that planning permission has been granted for residential development there, I consider that the Doyle Centre should not be named. I also agree with Exeter Trade Frames that the requirement for a viability assessment from the applicant, as implied by paragraph 15, could be unduly onerous. However, I am satisfied that the scope for community development should be considered ahead of redevelopment for residential use. Paragraph 15 should be re-written, as shown in **PM13**, so that regard is had for the NPPF, paragraph 173.
- 4.28 Policies EE3 and EE4 concerning development at the Magnolia Centre and Camperdown Creek were commented on by the District Council. The Town Council accepted that Policy EE3 should be modified to make clear that retail or mixed use development is being sought, and to emphasise that the Magnolia Centre is privately owned. The objective should also refer to private ownership. The Town Council confirmed that development at Camperdown Creek could include starter workshops with flats above. I consider that Policy EE4 need not be amended, but Policy EE3 and the objective should be modified as in **PM14**, so that it will contribute to the achievement of sustainable development.
- 4.29 Regarding Policy EE5, the District Council pointed out that planning permission has already been granted for mixed use leisure development. I note that full permission subject to conditions was granted in June 2018 for "New water sports centre including various facilities for water sports users, cafe, restaurant and retail plus car parking and open space with associated infrastructure including new stepped and ramped access to beach and landscaping". The Town Council argued that Policy EE5 was still needed, and would apply to subsequent phases. I am aware of the sensitivity of developing this very prominent seafront site and consider

that the policy should be retained. However, a reference to the June 2018 planning permission in the supporting text should be made for clarity and to contribute to the achievement of sustainable development on Queen's Drive. **PM15** should therefore be made.

Chapter 4 - Housing

- 4.30 As already stated under Matter 1, I consider that the Plan should adopt a more positive approach to the provision of new housing, recognising that there are high levels of need for new homes in Exmouth (estimated as a minimum of 1,229 new homes 2013-31 for Exmouth in the East Devon Local Plan). Paragraph 1 of Chapter 4, with its reference to "the over-massing and modernisation blight which has affected other seaside towns" sets a negative tone for housing provision. This should be modified, and a more positive statement made. In order to contribute to the achievement of sustainable development, the Neighbourhood Plan should commit to monitoring progress on housing development, on all allocated or windfall sites. Monitoring should enable the Town Council to ascertain whether policies are working effectively or need to be reviewed. A new ACTION should address monitoring of housing provision and the development of second home ownership, as mentioned in paragraph 2. **PM16** is necessary so that the Plan's approach to housing has regard for the NPPF, paragraphs 14, 17 and 47, and is in general conformity with the strategic policies of the Local Plan.
- 4.31 McCarthy & Stone objected to the first objective, Policy H1 and the supporting text, arguing that they appeared to wish to cut the supply of further accommodation for older people once the Local Plan target has been met. They referred to recent new national Planning Policy Guidance which advises that the need to provide for older people is critical as people are living longer. They also referred to a recent planning appeal in Sidmouth concerning extra care housing (APP/U1105/W/3177340), wherein the Inspector stated that there should not be ceilings on provision, and pointed out that future occupiers of the extra care housing were likely to move from homes in the local area. They would vacate the general housing stock, and their former homes could be taken up by younger people.
- 4.32 It seems to me that the needs of older people are varied, that some will choose/be able to remain in the properties they have occupied for a long time, where they have fond memories and the benefits of familiarity. Others will choose/require specialist care and extra care housing. There is therefore a good case for providing accessible and adaptable homes in which people can live at any age, as well as specialist care homes. I note that Strategy 4 of the Local Plan seeks to achieve balanced communities, and encourage residential development suitable for young people and younger families where there is an overtly aged population profile. This policy could mean that additional provision specifically for older people in care homes may not be the most appropriate in Exmouth in future. The Town Council proposed a new sentence to clarify what is meant by

“accessible and adaptable homes”, confirming that it had “no dislike for older persons life time homes”. I propose modification of Policy H1 to remove the impression that there would necessarily be a cap on Care/Extra Care homes in **PM17**, so that the Basic Conditions are met.

- 4.33 East Devon District Council requested that Policy H2 should encourage smaller 1 and 2 bed properties with an aim of delivering 607 social rented dwellings. It also sought more detail to be given about the “local connection clause”. I recommend modification to Policy H2 and the supporting text, as set out in **PM18**, having regard for the data on local need for social housing given in paragraph 12. I consider that the policy will then meet the Basic Conditions.

Chapter 5 – Getting about

- 4.34 This chapter covers the various travel modes, as well as traffic management and parking in a clear and comprehensive manner. Beginning with rail, it helpfully gives a summary of the Great Western Railway’s plans for improvement. It then describes bus services, before emphasising the need for a new public transport interchange in the area defined in Figure 17. I recognise the need for such a facility near the rail station, provision of which would be in general conformity with the Local Plan’s Strategy 22 paragraph 5a. The section on Taxis reports that the Taxi Drivers’ Association has concerns that Exmouth has no plans to establish recharging points for electric vehicles. East Devon District Council proposed that ACTION GAA4 could be re-written as a policy to ensure that provision of such points would be achieved when planning applications are determined. Such a policy, in my view, would contribute to the achievement of more sustainable transport options (leading to reduced air pollution), and I therefore recommend that a new Policy GAX is added, as in **PM19**.
- 4.35 Good pedestrian access is an important consideration for visitors and residents in Exmouth, especially within the town centre and waterfront areas. I fully support Policy GA1 to improve access and safety for pedestrians in the Magnolia Centre and along the Esplanade. The proposed extension to Dinan Way, in order to avoid traffic using inappropriate residential streets when travelling between the A376 and areas east of Exmouth, is described in the Traffic section. ACTION GAA9 supports the project which is included in the Devon Local Transport Plan No 3, 2011-26, and East Devon Local Plan Strategy 22. On this subject, the Neighbourhood Plan is in general conformity with the Local Plan, and I note that reference to the completion of Dinan Way has been welcomed by Devon County Council.
- 4.36 Parking arrangements are described appropriately from paragraph 35 onwards, in my opinion, with actions to control parking for motor homes and to rationalise parking charges and arrangements. The Access Strategy for Exmouth, originally focused on cycling infrastructure, now has a wider purpose to provide for pedestrians, disabled people and those with push

chairs. The need for Exmouth to have “a spider’s web of routes” radiating from the town centre seems to me to be very sensible and to have regard for the NPPF’s aim to promote sustainable transport, in paragraphs 29-41.

Chapter 6 – Community Facilities

- 4.37 This chapter addresses education, library, medical and health & wellbeing facilities, leisure and sports, shopping, public toilets, allotments and refuse collection and recycling. This demonstrates that the principal range of community facilities for Exmouth’s community have been considered fully by the plan-makers. Devon County Council requested that a reference be made to Policy W4 of the Devon Waste Plan which requires major development to be accompanied by a Waste Audit Statement. As the Neighbourhood Plan does not propose any new major development, I consider this to be unnecessary. The County Council also pointed out that the information relating to education in paragraphs 7-10 could be updated, for example there is now an Education Infrastructure Plan for 2016-33 replacing the one for 2013-31. I put forward modifications to these paragraphs to represent the most recent information, in **PM20**.
- 4.38 East Devon District Council requested that the references to specific areas in Policy CF1 be removed as enhanced health and wellbeing facilities are already sought across all areas. I agree, however, with the Town Council that local specificity is helpful. I therefore put forward **PM21**, to add the words “In particular” at the start of the second sentence of Policy CF1. As the Town Council advised that there has been no community consultation yet to identify a specific site for a new Health and Wellbeing hub near the LED Sports Centre and Imperial Rugby Ground, I consider that Policy CF2 need not be modified. Policies CF2, as well as CF3 and CF4 in support of new sport and leisure facilities and allotments, meet the Basic Conditions for neighbourhood planning.

Conclusions on Matter 2

- 4.39 I have put forward a number of modifications to specific policies in the Exmouth Neighbourhood Plan (PM3 – PM21 inclusive). These are all necessary having regard for national planning policy, to secure general conformity with the strategic policies of the East Devon Local Plan and contribute to the achievement of sustainable development. I conclude that the Basic Conditions will be satisfied, as long as all these modifications are made.

5. Conclusions

Summary

- 5.1 The Exmouth Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on Exmouth Neighbourhood Plan, the evidence documents submitted with it, and the Town Council's responses to my preliminary and additional questions.
- 5.2 I have made recommendations to modify a number of policies, figures and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Exmouth Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

- 5.4 I appreciate the hard work which the Neighbourhood Plan Steering Group has put in over the last three years to produce the Exmouth Neighbourhood Plan. It has spent considerable time and effort on consulting and engaging with the local community and stakeholders, in order to form a vision for Exmouth over the next 13 years, and to develop themes and policies which will contribute towards achieving that vision. Exmouth occupies an extensive area for a neighbourhood plan, with a sizeable population and complex economy, as well as a sensitive environment requiring detailed care and attention. The Neighbourhood Plan, once adopted, should greatly assist East Devon District Council in its development management role, ensuring that future development in the town achieves the highest planning standards, and contributes to Exmouth's aim to be a great place for all, young and old, to live, work and visit.

Jill Kingaby

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Plan cover and Page 11	Exmouth Neighbourhood Plan (2018 – 2031) 3. The Plan will provide the community’s vision for the future, from 2018 to 2031.
PM2	Pages 12 & 13	Add Ward Map between Pages 12 and 13, as new Figure. 12. Like all neighbourhood plans,whole district for the next thirteen years. Chapter 10 of the Local Plan sets out a vision for Exmouth of “Housing provision, including affordable housing, to serve the town and an employment led regeneration agenda. We will seek to reduce out commuting through indigenous employment growth and tourism related development. A focus will be on town centre enhancement, increased accessibility, improved retail provision and community facilities. We will plan for the completion of Dinan Way and to improve public transport links to Exeter”. Strategy 22 of the Local Plan relates specifically to future development at Exmouth. The Neighbourhood Plan reflects this and the other these-Local Plan policies..... 13. Neighbourhood Plans shouldthe district-wide plan. The Exmouth Town Centre and Seafront masterplan by LDA Design, 2011, is referenced in the East Devon Local Plan. It was produced to guide regeneration of the town

		<p>centre and waterfront and reflected partnership working by the County, District and Town Councils. Regeneration work has begun, and the Neighbourhood Plan will take forward the broad aims of the Masterplan for ongoing regeneration.</p>
	New Figure xx	Add a new map following Page 13 - The 'Masterplan Area' .
PM3	Page 20	Paragraph 5 – delete the last sentence.
PM4	Page 24	Add a reference to the sentence ending "... Barbastelle Bat of which fewer than 5,000 are known to exist" in paragraph 9. The reference document is The Ecological Appraisal by The Environmental Dimension Partnership (EDP) (2014) .
PM5	Pages 23 and 26	<p>6. The approved Local Plan also defines ...the open countryside. Within the BUAB, development consistent with Strategy 22 and other policies of the Local Plan will be permitted. In turn there is a presumption against</p> <p>Replace Figure 5 with map showing Former Marley Estate as well as Former Bystock Estate.</p> <p>Policy EN1:Development within the Marleyoutside the BUAB (FIG 1). Proposals for development within the Built-up Area Boundary (BUAB) will generally be supported. Proposals for development in areas outside the BUAB will only be permitted where they are in accordance with specific policy within the Exmouth Neighbourhood Plan or, where absent, policy or site specific allocations contained in the EDLP 2013-31.</p> <p>Development will only be permitted where it would not harm the distinctive landscape, amenity and</p>

		<p>environmental qualities within which it is located, including:</p> <ol style="list-style-type: none"> 1 Land form and patterns of settlement. 2 Important natural and manmade features which contribute to the local landscape character, including topography, traditional field boundaries, areas of importance for nature conservation and rural buildings. 3 The adverse disruption of a public view which forms part of the distinctive character of the area or otherwise causes significant visual intrusion. <p>The following sites have been identified as locally important and distinctive areas outside the BUAB where only minor proposals, associated with existing residential or business premises, are likely to be supported.</p> <ol style="list-style-type: none"> i) Marley Area north of Goodmores (FIG 5) ii) Bystock House Estate (FIG 5).
PM6	Pages 27 to 31	<p>Add a new figure, Exmouth Green Spaces, to illustrate the text on Page 27</p> <p>16. At its southern end t This valley provides a much valued green space between The Avenues ... on the other. <i>The Valley Park would be located outside Exmouth's BUAB to the south of the town.</i> At its northern end community of Exmouth. <i>Immediately south-west of the proposed Valley Park, within the BUAB, are the Maer Road car park, cricket ground, the Maer, tennis courts and play area, which offer potential for a green corridor extending to the seafront. The Town Council will investigate the scope for designating an Area of Local Green Space here (excluding</i></p>

		<p>the car park) to protect the much valued areas.</p> <p>Policy EN3: The area of land ... towards the Maer (FIG 8)</p> <p>New ACTION NEA4 a) ETC will investigate with EDDC and the community the scope for designating valuable areas at the Maer, cricket ground, tennis courts and play areas as Local Green Space.</p> <p>Responsibility: ETC</p> <p>Figure 8 – replace with revised map showing the Proposed Littleham/Maer Valley Park and the BUAB.</p>
PM7	Page 32 & 34	<p>ACTION NEA6: For ETC</p> <p>Enhance public awareness of urban biodiversity and other biodiversity areas by consulting local stakeholders through early and regular engagement</p> <p>25. When new builtSolar panels on appropriate roofs and water harvesting are important features for all-much new development..... outdoor lights should be angled downwards and be switched off earlier used sparingly.</p>
PM8	Page 35	<p>Policy EN4: Development proposals character and appearance of the area, to protect the amenity of residents or occupiers of holiday accommodation, and mitigate against</p>
PM9	Pages 44 - 47	<p>At the top of Page 44, above paragraph 1, add the heading <u>History of Exmouth's built environment</u></p> <p>Page 46, above paragraph 12, add the heading <u>Future development.</u></p> <p>12. Exmouth, having regard ... spring of 2016.</p> <p>12a. Strategy 2 of the Local Plan sets out the scale and distribution of future residential development</p>

		<p>across East Devon sought for the plan period. It expects Exmouth to deliver 1,229 new homes between 2013 and 2031. Strategy 22 of the Local Plan - Development at Exmouth aims to promote new homes, significant new employment provision, new retail and commercial facilities in the town centre, as well as key infrastructure provision. Strategic allocations and small sites shown on the Brownfield Land Register are expected to yield new housing development as follows:</p> <p>Goodmores Farm – 350 units</p> <p>Plumb Park – 350 units</p> <p>Land adjacent Withycombe Brook – 52 units</p> <p>Land at Exebank and Danby House – 36 units</p> <p>Redevelopment of Rolle College playing field – 23</p> <p>Redevelopment of former Pankhurst Close trading estate – 50</p> <p>Exmouth has achieved a relatively high number of new dwellings from windfall sites in the past (59 completions in 2017/18), and this trend is expected to continue.</p> <p>12b. The Local Plan allocates around 3 hectares of land for employment use at Liverton Business Park and 0.5 hectares on land south of Redgate. It lists key elements of infrastructure which are needed as:</p> <p>a) An integrated transport interchange and upgrading of public transport provision;</p>
--	--	--

		<p>b) Completion of Dinan Way; c) Upgrades to sewerage, mains gas and water supply, education, medical and social care provision to support the growing community; d) New primary school with nursery at Goodmores Farm; e) Improved walking and cycling routes in the town.</p> <p>12c. With the provision of new housing, employment and supporting infrastructure, the built environment of Exmouth will change over the plan period.</p> <p><u>Regeneration of the town centre and seafront</u></p> <p>13. Responses to the initial</p> <p>14. The Exmouth Masterplan ... specific areas of the town as shown on Figure xx. It is important that these ideas....</p> <p>Page 47, Add a new heading before the Objective to read: <u>Conservation of heritage assets.</u></p>
PM10	Page 47-50	<p>Objective: To ensure the conservation and/or enhancement of areas, buildings and other features which for historic or architectural reasons</p> <p>Following the Objective for Prominent Buildings in Exmouth, add a new paragraph as follows:</p> <p>Local historians identified a number of potential Prominent Buildings and Residential Areas of Special Character in the town. After public consultation on the buildings and areas, the following were defined. The majority but not all prominent buildings have listed building status, and most but not all the residential areas are located in conservation areas. The</p>

		<p>status and position of each is shown in Appendix 1.</p> <p>Figure 10 – Conservation Area Map</p> <p>Amend the map so that it names each conservation area, and shows the location of clusters of listed buildings. Add a footnote to the map to refer to the website for British listed buildings in Exmouth.</p> <p>Add Appendix 1 – to include Tables 1 and 2, as set out in letter of 13th Dec 2018, to IPE from the Town Council.</p>
PM11	Page 51	<p>Policy EB1- modify second bullet as follows:</p> <ul style="list-style-type: none"> - be in compliance(2010) and the "Exmouth Register of Historic and Architectural Features", once established.
PM12	Page 56	<p>Following paragraph 12, add</p> <p>Policy EEx : Tourism</p> <p>Proposals for tourist facilities and holiday accommodation in the Exmouth Neighbourhood Plan area will be supported in order to boost the local economy and enhance the promotion and development of the area as a suitable holiday destination. Proposals must consider and not adversely affect the character and functioning of the local area.</p> <p>New supporting text to this policy should be added:</p> <p>East Devon Local Plan recognises the importance of promoting its tourism industry to maintain a vibrant visitor and business environment. Tourism can help regenerate settlements and provide a context for enterprise and innovation. Strategy 33 in the Local Plan seeks to support and facilitate high quality tourism in East Devon that promotes a year round industry</p>

		and responds to changing visitor demands. Tourism should be sustainable, and should not damage Exmouth's natural assets. The Town Council and stakeholders will aim to attract new businesses that can complement the high quality physical and built environment.
PM13	Page 58	<p>Paragraph 15 – Modify the first sentence as follows:</p> <p>The intention to prioritisePankhurst Engineering site (Littleham Road) and potentially the former Doyle Centre (Salterton Road). Change of use ... not be allowed unless:</p> <ul style="list-style-type: none"> • The change of use applicant can demonstrate through a viability assessment that no viable <p>Policy EE1: Modify the second sentence –</p> <p>Such development should seek to use previously developed land (Brownfield sites) within the BUAB, wherever possible.</p>
PM14	Page 59	<p>Objective: Support and promote a regeneration scheme for the Magnolia Centre (in private ownership) and ...</p> <p>Policy EE3 Retail or mixed use D development proposals for the regeneration of the Magnolia Centre (in private ownership)</p>
PM15	Page 62	<p>Paragraph 25 – insert a new sentence as follows-</p> <p>The Exmouth Masterplan involving Hemingway Design. In June 2018, full planning permission with conditions was granted for a new water sports centre including various facilities for water sports users, cafe, restaurant, and retail plus car parking and open space, with associated infrastructure including new stepped and ramped access to the beach and landscaping.</p>

		Therefore, Policy EE5 of this Neighbourhood Plan will apply only to Phase 3 and any subsequent development proposals.
PM16	Page 66	<p>1. Exmouth will accommodate new housing development to meet its local requirements, currently calculated to be 1,229 new units for the period 2013-31.¹ It will seek to establish inclusive communities catering for all age and income groups, and ensuring a balance between homes and jobs, education, social and community facilities. Within its outstanding natural environment.....Built Environment chapter. In the main ...other seaside towns. The challenge now is to deal with the pressures-need for more residential accommodation enshrined in the EDLP and to establish policies which protect the quality of life of existing residents and the outstanding features of the natural and built environment, through good planning and development management by addressing development proposals in a realistic way.</p> <p>After paragraph 2, add a new ACTION HAx: The Town Council will monitor development progress on allocated housing sites and windfall sites to ascertain whether housing needs for different population groups are being met appropriately. The use of Exmouth's residential accommodation as second homes/holiday homes will also be monitored.</p> <p>Responsibility: EDDC, ETC</p> <p>¹ See details of development on page [xx].</p>
PM17	Page 66 & 67	Policy H1: In addition to Beyond the delivery Adaptable homes, rather than

		<p>limited older people's accommodation, to ensure a balanced</p> <p>10. The central issue ...for all ages and abilities. Policy H1 seeks to promote a variety of housing provision for the elderly. Firstly, ongoing provision for care and extra care homes and, secondly, priority will be given to developments which can provide for lifelong accommodation needs, rather than being age restricted.</p>
PM18	Page 67	<p>11. Housing for people on averagesocially rented dwellings. Strategy 35 of the Local Plan sets out "local connection" criteria which are to be applied in priority order when affordable housing becomes available. These criteria, beginning with permanent residency in Exmouth for a continuous period of three years ..., will be used when new affordable housing becomes available.</p> <p>Policy H2: To meet the identified need ... 25% affordable units. The majority of affordable units should provide 1 or 2 bedroom housing. which Occupancy will be subject to a local connection clause.</p>
PM19	Page 74	<p>Action GAA4 to be re-written as</p> <p>Policy GAx: Development proposals which include public electric charging points at the following types of facility will be supported:</p> <ul style="list-style-type: none"> - supermarkets - Large Business premises.
PM20	Pages 84 & 85	<p>7. Given Exmouth's increasing(Education Infrastructure Plan 2013-31-2016-33) of pupil covers the period 2013-31 2016-33 ...</p>

		<p>8. The position projected ...for 2016-17. Recent projections of pupil numbers have shown small shortfalls followed the next year by small surpluses against available places. While this is not a there have not been substantial differences, it does indicate</p> <p>10. With 2,600 pupils in Devon's largest town. This is Devon County Council's top priority to secure funding. Any opportunities for potential funding from other sources will be investigated and reported to the County Council.</p>
PM21	Page 88	<p>Policy CF1: Development that contributeswill be supported. In particular, eEnhancement and development to improve</p>