

INDEPENDENT EXAMINATION OF THE EXMOUTH NEIGHBOURHOOD PLAN

EXAMINER: Jill Kingaby BSc (Econ) MSc MRTPI

Roy Pryke
Chair of the Neighbourhood Plan Steering Group
Exmouth Town Council

Phil Twamley
Neighbourhood Planning Officer
East Devon District Council

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Dear Mr Pryke and Mr Twamley

EXMOUTH NEIGHBOURHOOD PLAN EXAMINATION

Following my site visit to Exmouth on Monday 12th November 2018, and after reading the submitted Neighbourhood Plan and background material, I have a number of preliminary questions. It would greatly assist my examination if the Town Council (in liaison with East Devon District Council) could provide responses to the following questions, ideally within 2 weeks of receipt of this letter.

1. Firstly, what is the status of the Exmouth Town Centre and Seafront Masterplan by LDA Design, published in December 2011? This is referenced in the Neighbourhood Plan, for example on Page 60 in paragraph 22. The East Devon Local Plan adopted in January 2016 states that “The Local Plan will incorporate the key findings of the Masterplan work” (paragraph 10.5), and “a new or refreshed Masterplan will be produced with this becoming a Supplementary Planning Document” (paragraph 10.9). Has this aim of the Local Plan been achieved and, importantly, has the submitted Neighbourhood Plan had sufficient regard for the detailed assessment of the town centre and waterfront contained in the Masterplan?
2. Strategy 2 of the adopted East Devon Local Plan includes statistics related to future housing development in Exmouth. A total of 1,229 new dwellings in the 2013 to 2031 period are expected as per *Table 1* below.

Table 1

Description	New Dwellings
Built 2013-2014	140
With planning permission or under construction end September 2014	587
Having made progress through the planning system	152
Strategic allocations	350
Total	1229

The Neighbourhood Plan includes no description or analysis of potential housing sites. East Devon’s Strategic Housing Land Availability Assessment only provides data on its website to 2012. What is the up-to-date situation regarding house-building in Exmouth, and what

development is expected to occur (and where precisely) over the Neighbourhood Plan period? More detailed information of projected housing numbers, house types (e.g. Strategy 36 of the Local Plan refers to 150 Care/Extra Care Homes at Exmouth) and specific locations would be helpful.

3. Paragraphs 14 and 47 of the National Planning Policy Framework (NPPF) expect local planning authorities to positively seek development opportunities to meet the development needs of their area, and boost significantly the supply of housing. Neighbourhood Plans should have regard for the NPPF and promote sustainable development. 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, seeks to limit the provision of additional Care/Extra Care housing. It has been criticised by East Devon District Council and McCarthy & Stone at the Regulation 16 consultation stage. All this raises the question as to whether the Neighbourhood Plan is sufficiently positive and supportive of future housing development, having regard for the NPPF, the promotion of sustainable development and the requirement for general conformity with the Local Plan?
4. East Devon District Council proposed a number of changes to the submitted Neighbourhood Plan, as contained in its Regulation 16 consultation response. It would be helpful to understand the Town Council's position on each of the comments made, and to learn whether further amendments should be made to address the points raised.
5. Other respondents also put forward objections to the submitted Neighbourhood Plan, in particular McCarthy & Stone, Devon County Council (including its Historic Environment Team), Collier Planning for Exeter Trade Frames Ltd, and Lichfields for Bourne Leisure Limited. Does the Town Council have any comments to make on these objections, or any proposals for amendment to the Plan?
6. Exmouth is a sizeable town with a number of suburbs and distinctive green areas, as well as a town centre, seafront, harbour and land beside the river Exe. The Neighbourhood Plan describes many of these sub-areas, which may be well-known to local residents. However, for other readers their location is not always clear. Chapter 2 - The Built Environment refers to Settlement Areas, other areas such as "the Colony", "Halsdon, Rivermead, Brixington and beyond", and specific areas covered by the Exmouth Masterplan. The Neighbourhood Plan would be more accessible to readers and potential users if the main areas of Exmouth and its important features, as highlighted in the Plan, were shown on maps. Please would you consider adding new maps with clear titles and keys to the submitted Plan?
7. The Introduction to the Neighbourhood Plan states that, when made, it will sit alongside the East Devon Local Plan (2016-31). The title of the Basic Conditions Statement, accompanying the submitted Plan, implies that the Exmouth Neighbourhood Plan will run from 2018 to 2031. The time period should be made clear in the Plan itself. I propose to amend the title page and the Introduction to make clear that the Plan would apply to the time period 2018-31, unless the Town Council has reason to suggest otherwise.

In the interests of transparency, may I prevail upon you to ensure a copy of this letter is placed on the town council and local authority's websites.

Thank you in advance for your assistance.

Your sincerely

Jill Kingaby

Examiner