



Dear Jill Kingaby,

November 28th 2018

Thank you for your letter dated 19th November.

Below is the shared response of EDDC and ETC regarding the seven preliminary questions you raised after reading the Exmouth Neighbourhood Plan.

Shared response by EDDC and ETC (Please note that there are sections in which ETC have responded separately from EDDC when this happens the ownership of a response is labelled.)

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?*

Shared Response: When the Local Plan was written it was envisaged that the Masterplan work (which has the status of an informal guidance document) would be incorporated into a comprehensive SPD with the aim of regenerating the town centre and waterfront, something the County, District and Town Councils had been working in partnership to achieve for many years. Following adoption of the Local Plan, but before the SPD could be produced, a number of planning applications were made by private organisations which broadly conformed to the Masterplan and kick-started the regeneration process. The District Council has focussed resources on the continued regeneration of the area covered by the Masterplan, particularly those waterfront areas which it owns, and there is no longer a need for a separate SPD. The District Council and ETC are satisfied that the broad aims of the Masterplan are met by the Neighbourhood Plan and that it will support the ongoing regeneration of the town.

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.

Shared response: The Local Plan contains a number of strategic allocations (Strategy 22) and sites which had progressed significantly through the planning system at the time the Plan was proposed (identified in Strategy 2). The Brownfield Land Register also identifies sites suitable for 5 or more dwellings which are likely to come forward during the Plan period. The relevant sites in Exmouth are:

Goodmores Farm – 350 (as per the strategic allocation in the table) with the first completions expected in 2020/21;

Plumb Park – 350 with the first completions expected in 2018/19;

Land adjoining Withycombe Brook – 52 with the first completions expected in 2018/19;

Land at Exebank and Danby House – 36 with the first completions expected in 2018/19;

Redevelopment of Rolle College playing field – 23;

Redevelopment of the former Pankhurst Close Trading Estate – 50.

In addition to these strategic sites, Exmouth has always benefitted from a relatively high proportion of windfall sites and it is anticipated that this will continue under the Exmouth Neighbourhood Plan.



The latest Housing Monitoring Update (for 2017/18) records 59 completions in Exmouth; a full HMU for 2016/17 was not completed but the 2015/16 figure was 74 and the 2014/15 HMU figure was 96. This demonstrates a steady supply of houses being delivered and proposed over the Plan period.

As for care / extra-care places in Exmouth during the Local Plan period, such development is proposed at Sheridan House Care Home (24 beds; first counted in 2013/14), 52 care assisted apartments on Douglas Avenue (completed 2015) and the redevelopment of Moreton Care Home / 13a Drakes Avenue into 70 retirement living with care units (work yet to begin), which meets the need identified in the Plan.

The up to date statistics provided above show that the Exmouth 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. Growth capacity within the BUAB will provide a steady supply of houses being delivered and proposed over the Plan period.

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?*

Shared Response: From our perspective we would say that the Plan is sufficiently positive given the circumstances. Exmouth grew significantly in the 1980's and 90's with limited social or physical infrastructure to support this growth; in part the Neighbourhood Plan proposes measures to address these shortfalls and it recognises the Local Plan allocations. These are sufficient to meet the level of need identified by the LPA for Exmouth and



propose measures to ensure that this development will contribute positively to the town as a whole. The Plan recognises that accommodating further strategic growth is problematic - an issue also recognised in the Local Plan. Exmouth is located in a highly sensitive position in environmental and landscape terms and is constrained on two sides by the sea and estuary and on the other two sides by AONB and internationally important habitat. Any further strategic development would need to demonstrate that the habitat impact can be mitigated, and, whilst the Local Plan has a mitigation strategy in place, this involves SANGS outside Exmouth Parish and beyond the control/gift of the Town Council and the NP.

The Marley and Bystock areas were considered as an option for growth in the preparation of the adopted Local Plan and were subject to very strong opposition, predominantly on local amenity, habitat and landscape grounds. The NP reflects the LP position in this matter.

ETC Response: - Response to 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.

In the Objective on p 66 there is evidence that Exmouth has an increasing demographic towards the elderly. Policy H1 does not seek to limit additional Care/Extra Care Housing because this provision will be provided by Strategy 36.

The Neighbourhood Plan policy H1 is trying to promote a variety of housing provision. Firstly, by ongoing provision for Care and Extra Care homes, and secondly by supporting provision of accessible and adaptable housing for life long accommodation which are more flexible and will provide houses for the elderly as well as young people and families. This enables Exmouth Neighbourhood Plan to meet the identified needs as seen in the Objective on p66 and to Paragraph 14 p 69.

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.*



EDDC Cmnt No	Issue / Policy In Plan	Comment
1.	Para.9	<p>Suggest statements on the presence of rare species reference an appropriate evidence base.</p> <p>ETC Agree with comment and agree to changes as seen below</p> <ul style="list-style-type: none"> ➤ Reference found: If needed will be put in EN section in Paragraph 9 change 18 to 18a ➤ add 18b at the end of Para 9 ➤ add to Reference Section and ➤ upload onto Website
2.	EN1	<p>EN1 is considered overly restrictive, some development may be acceptable (fence / parking space / garage / extension). We suggest detailing development that would not be supported or allow some flexibility for residents and business owners.</p> <p>Agree to change the policy to add clarity and to add Marley area onto Fig 5</p> <p>Rewrite of Policy EN1 –</p> <p>Proposals for development in those areas outside of the Built-up Area Boundary (BUAB) will only be permitted where they are in accordance with specific policy contained within the Exmouth Neighbourhood Plan or, where absent, policy or site specific allocations contained in the EDLP 2013-2031.</p> <p>Development will only be supported where it would not harm the distinctive landscape, amenity and 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 view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions. <p>The following sites have been identified as locally important and distinctive areas outside of the BUAB where only minor proposals, associated with existing residential or business premises, are likely to be supported.</p> <p>i) Marley Area north of Goodmores (FIG 5)</p>



EDDC Cmnt No	Issue / Policy In Plan	Comment
		ii) Bystock House Estate (FIG 5)
3.	FIG 5	The figure outlines the former Bystock Estate but fails to define the Marley area, we suggest this is added for clarity. Agree to change Fig 5.
4.	Policy EB1	Whilst traditional shop frontages have clear supporting guidance established by the adopted "Exmouth Shopfront Design Guide", the identification of historic street furniture and any associated development guidance is not present. Action EBA2 seeks to establish a register of historic and architectural features. We suggest Policy EB1, point 2 is revised to <i>'be in compliance with the revised "Exmouth Shop Front Design Guide (2010)" and the "Exmouth Register of Historic and Architectural Features", once established.</i> Agree to change as this strengthens the policy.
5.	Policy EE2	We suggest that this policy is covered by Strategy 32 and offers no local specificity. Strategy 32 provides comprehensive policy to resist the loss of employment, retail and community sites and buildings. There is planning application evidence that a significant number of sites in Exmouth have not been protected by Strategy 32. Community consultation provided evidence of how the strongly the residents felt about loss of employment sites, and this need to remain within the plan. It is difficult to be locally specific as it is happening in all the wards across the town. Would agree modification to include local specificity so that the policy remains.
6.	Policy EE3	We suggest the policy is reworded to include reference to 'Retail or mixed-use development proposals...'. The policy does not read as being intended to support 100% residential. Agree for this to be changed EE3 Retail or mixed development proposals...
7.	Policy EE4	This policy currently allows proposals for mixed-use developments including residential. Is this the group's intention? Yes - it is good to have starter



EDDC Cmnt No	Issue / Policy In Plan	Comment
		workshops with flats above. Good model for regeneration and to provide less expensive accommodation. No Change
8.	Policy EE5	Note that there is already planning approval in place for a mixed-use leisure development on the site. There is acceptance and awareness of existing planning approval for mixed use leisure, but this policy refers to subsequent phases so No Change.
9.	Policy H1	We do not agree that this policy will ensure a balanced housing stock as it will not prevent further care/extra care provision beyond the numbers proposed in Strategy 36. Disagree: This policy will ensure balanced housing stock as housing for elderly is provided in this policy beyond those in Strategy 36. Agree to modifications to the policy if the modification include and clarify the points below. The Neighbourhood Plan policy H1 is trying to promote a variety of housing provision for the elderly. Firstly ongoing provision for Care and Extra Care homes and secondly a priority provision for developments which can provide for life long accommodation rather than age restricted. Policy H1 does not seek to limit additional Care/Extra Care Housing because this provision will be provided by Strategy 36. Policy H1 Focuses on the Neighbourhood Plan supporting provision of accessible and adaptable housing which are more flexible and will provide houses for the elderly as well as young people and families. This enables Exmouth Neighbourhood Plan to meet the identified needs as seen in the Objective on p66 and in Paragraph 14 p 69.
10.	Policy H2	We'd suggest that the policy is modified to mention the evidence base supplied in para.12 to encourage smaller 1 and 2 bed properties with an aim of delivering 607 socially rented dwellings. The local connection clause should be detailed in full. Agree to add text from Para 12, and to add local connection clause from the East Devon Local Plan.



EDDC Cmmt No	Issue / Policy In Plan	Comment
11.	Action GAA4	We'd suggest that this could be reworded to form a policy to ensure provision of electric charging points (EV Points) within planning applications. Agree to this as this is a positive addition and agree change.
12.	Policy CF1	The sentence referencing Brixington and Goodmores could be removed as enhancement is already encouraged across all areas. No change: this is providing local specificity which is what NP's are required to do.
13.	Policy CF2	Suggest this policy is linked to the specific site, mapped, and worded to prevent other development of the site. No change: Specific site details were taken out on advice given by EDDC prior to Reg 14 . There has been no community consultation to identify a specific site.
14.	P92. Paras. 32-36	It should be noted that the Magnolia Centre is in private ownership and that this impacts upon the ability to influence and/or intervene in its development. Agree and to include (in private ownership after the title Magnolia Centre in the Objective on p59 and in Policy EE3.
15.	EN3, p.30	EN3 is considered overly restrictive, limiting potential development inside the Built-up Area Boundary (BUAB) contrary to Strategy 6 of the Local Plan. The 'non-prescriptive boundary' shown in figure 8 crosses the BUAB and includes the Maer road car park, cricket ground, the Maer, tennis courts and play area. We suggest that the boundary is limited to those areas outside of the BUAB, retaining the potential to provide a green corridor connected to the sea front in line with community aspirations, supported by Strategy 5 of the Local Plan. We suggest that those valuable areas identified (the Maer, cricket ground, tennis courts and play area) are considered for alternative designation (ie. Local Green Space) if the group feels that extra protection for these areas is warranted. Agree to re draw Fig 8 to show the BUAB, and happy to consider LGS designation of the much valued areas identified.

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?*



Respondent	Policy: Paragraph Or Action Point	ETC Comments
Collier Planning	EE2	NP happy for business use to continue and there is community support for this.
	Bullet point 1, 3 Para15	No support to remove reference to applicant, and to remove bullet point 3. These details are within the text and not policy: no change
	H2	In Support no change needed
Respondent 1	EN3	In support no change needed
Chamber of Commerce	ENP	In support no change needed
McCarthy & Stone 1	EE2 Ch3 Para 14	No support for the wording provided to amend EE2. Community support for Redgates and other employment sites to remain as employment land.
McCarthy & Stone 2	H1, Ch3 Para 2,5,14 and first Objective	Agree for a sentence to be added that clarifies the terms Accessible and Adaptable homes in the ENP Policy H1. "Accessible and Adaptable homes are homes which enable older people to live independently and safely in their own home for as long as they like and/ or for the young people in the community." ENP support housing provision for both groups and there is no dislike for older persons life time homes. NP Strongly against housing being built on employment land. Policy EE2
Devon County Council	Para 3, p21/22, CF Par 48, GA Para 32, CF Para 7,8,10	Comments noted on suggestions. The County Council reported that it "does not have any objection to the plan".
EDDC	See separate Doc	See separate Doc



Environment Agency	EN3, EN6 EN7, EN8	In support no change needed
Historic England	No comments	In support no change needed
Natural England	No comments	In support no change needed
National Grid	No comments	In support no change needed
Network Rail	No comments	In Support no change needed
Lichfields	Para 10 ,11 NEA8	NP in support of a Tourism Policy. Policy presented on p4 is agreed.
	EN4	NP is happy for EN4 to remain but will consider the Examiners comments. Most of the comments made can be dealt with through the existing EDDC planning application process.
	EN5	No action and will wait for Examiners lead. The rewritten Policy acceptable if required.
	NEA6	No action and will wait for Examiners lead. The amendments acceptable if required.
	Para 5 & 19 NE	No change- this is general text and not policy.
	Para 24,25 Ch1	No change - this is general text and not policy

The NPSG / Town Council to respond.

- 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?



Shared Response: We agree that adding maps would add clarity to the Plan. We agreed to adding 3 Maps: Map 1 showing the Exmouth Masterplan Area, Map 2 showing green spaces and Map 3 showing the different settlement areas referred to in the NP. These maps will improve and enhance the NP document. We suggest that this is agreed as a modification for the referendum version.

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.*

Shared response: The Local Plan runs 2013-2031. We agree to amending the time period on the title page and the introduction.

Yours sincerely,

Janvrin Edbrooke
ETC Neighbourhood Plan Officer