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**Marley Road (LP\_Exmo\_04A)**  
**East Devon Local Plan**  
**Consultation**

M7 Planning Ltd

13 January 2023

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## 1.0 Introduction

- 1.1 The enclosed representations have been prepared on behalf of M7 Planning Ltd ('M7 Planning') who has land interests at Marley Road, Exmouth. M7 Planning is an established land promotion company who has vast experience in delivering sustainable strategic residential developments in the southwest of England.
- 1.2 The below representations build on the comments submitted on behalf of M7 Planning to the Issues and Option consultation carried out in early 2021. M7 Planning supported the objectives that had been identified by the Council - as the scope of objectives covered the key challenges facing East Devon whilst appearing to maintain a level of pragmatism that is vital in ensuring that East Devon continues to grow and meet the needs of local communities.
- 1.3 Land off Marley Road (Exmo\_04a) is an unconstrained site that has a vital role to play in meeting the growth needs of Exmouth and has therefore rightfully been identified as a proposed residential allocation in the Draft East Devon Local Plan.
- 1.4 We note that the proposed allocation is classified as 'second choice' which we object to as the absence of technical or environmental constraints, coupled with its sustainable location mean that that Land at Marley Road is an obvious location to accommodate future growth that is akin to 'preferred' proposed allocations. In any event, the existing growth requirements of East Devon and Exmouth specifically dictate that all sites identified as proposed allocations regardless of preference are necessary to ensure the plan is legally sound.
- 1.5 Whilst we question the assumed capacity identified for this site and its designation as a second-choice proposed allocation, M7 Planning welcomes and supports the site's proposed allocation in the draft Local Plan.
- 1.6 Land at Marley Road is a significant opportunity, within an exceptional location, for a sustainable new housing scheme. The proposed development as has been set out in the call-for sites submission previously is expected to comprise:
- 1 130 dwellings of varying types and sizes ranging from 1, 2, 3-and 4-bedroom homes which will include homes that cater for first time buyers and the elderly.
  - 2 The proposal aims to deliver emerging policy compliant affordable housing provision (35% - 46 homes). Affordable housing will be integrated into the scheme layout using the same design principles as for the open market housing.
  - 3 The affordable housing will include a mix of social rented, affordable rented and intermediate tenures.
  - 4 Sustainable living with solar power generation and electric charging points delivered on site.
- 1.7 The land is unconstrained, and a previous outline planning application (14/3022/MOUT) demonstrated that there were no technical constraints (ecology, flooding, landscaping, highways and heritage). The development is deliverable within a short time frame and will embrace the sustainability aspirations of the emerging Local Plan.

- 1.8            Additionally, whilst the wider allocation in this location comprises separate ownership controls, we have no objection to some masterplanning work being undertaken collaboratively (i.e., through the preparation of an indicative concept masterplan to illustratively demonstrate the allocation’s potential for the delivery of a cohesive and permeable layout design), so long as that does not inhibit the opportunity to deliver EXMO\_04a in expedient fashion. In doing so, we seek to continue our support for EDDC’s emerging Local Plan process, the proposed direction of strategic growth, and the delivery of much needed high quality new homes in this excellent sustainable location.

## 2.0 **Strategic Policy 1 - Spatial Strategy**

### **Support subject to amendments**

- 2.1 The aim of the spatial strategy is to direct new development towards the most sustainable locations in East Devon. The spatial strategy seeks to focus new development at locations that are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Our client is entirely supportive of this approach.
- 2.2 A key part of the spatial strategy is to outline East Devon's settlement hierarchy, whereby the level of growth assigned to a settlement is determined by their existing sustainability characteristics. Our client agrees with the hierarchical approach in principle. It is, however, vitally important that the hierarchy correctly reflects the existing characteristics of settlements within East Devon and assigns appropriate levels of growth to each.
- 2.3 As it stands, the spatial strategy seeks to focus most growth and development to the proposed new town and the western side of the district, whilst Exmouth (the principal centre), in addition to main centres, is considered to only be able to accommodate significant development. To assign the same level of growth to Exmouth, a tier 1 settlement, as Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth, all of which are considered tier 2 settlements, is questionable and appears to be at odds with the 'Role and Function of Settlements' background evidence study which confirms that Exmouth has by far the largest population by a significant margin and the most economically active compared to the other seven towns.
- 2.4 By the Plan's own admission, Exmouth has superior sustainability credentials than the five main centres (Paragraph 3.5) and is considered to perform a higher function in respect of serving a wider catchment and benefit from good public transport connections. However, this view has not been translated into SP1.
- 2.5 If the underlying objective of the emerging Plan is to direct development towards the most sustainable locations, we consider that it is essential for the spatial strategy to be amended to reflect the settlement hierarchy and acknowledge that Exmouth, a tier 1 settlement, should also be a 'focus' for new development (akin to the new settlement and the western side of the district) rather than a settlement that can only accommodate significant growth. This amendment would ensure that the spatial strategy is consistent with the settlement hierarchy and is justified.
- 2.6 The sustainability credentials of Marley Road (Exmo\_04A) are abundantly clear as evidenced through the proposed allocation. It is essential that whilst proposed allocations are maintained and carried forward to the publication version of the Plan that sustainable sites within Exmouth are put forward as proposed allocations without any differentiation in preference.

## 3.0 **Strategic Policy 2 – Housing Distribution**

### **Object**

- 3.1 The proposed housing distribution across East Devon which seeks to implement the Plan's spatial strategy is detailed within draft SP2.
- 3.2 As set out in our representations in respect of draft SP1 we do not consider that the proposed spatial strategy sufficiently distinguishes the sustainability credentials of Exmouth from Tier 2 settlements, even though the supporting evidence base does.
- 3.3 We consider that the spatial strategy should be amended so that Exmouth is included in the 'focus' for new development category rather than a settlement where development is significantly promoted. As it stands, we consider that the Spatial Strategy is unjustified as it is at odds with the evidence base that is meant to support it. It is on this basis that we question the distribution of growth under SP2.
- 3.4 Exmouth, despite being identified as the only Tier 1 Principal Centre in 'The Role and Function of Settlements' study is proposed to accommodate only 1,033 dwellings. For context, Axminster which is identified as a tier 2 Main Centre is intended to accommodate 1,050 dwellings – a figure slightly greater than Exmouth. Furthermore, when separated into preferred sites and 2<sup>nd</sup> choice sites, Axminster is viewed more favourably having 680 preferred site allocations to Exmouth's 287. Indeed, Exmouth's preferred sites is on par with Honiton and Ottery St Mary (182 and 248)– settlements that are significantly constrained (AONB surrounding Honiton) and lack of necessary public transport infrastructure (Ottery St Mary has no train station).
- 3.5 The evidence base is clear that the highest functioning settlement within East Devon is Exmouth and therefore the quantum of growth that is directed to Exmouth needs to be substantially increased to ensure that the Plan is sound.
- 3.6 To ensure Exmouth accommodates an appropriate level of growth further opportunities at the Principal Centre need to be explored in addition to proposed allocations being utilised as efficiently as possible. For example, the proposed allocation at Marley Road is not being optimised in terms of site capacity.
- 3.7 The site capacity for Exmo\_04a is not specifically set out in the draft Plan but the consultation website includes a link to a high-level assessment of the site which notes an indicative capacity of 70 dwellings and potentially a contribution to employment land. The basis of this capacity is unclear, and it does not align with the planning history for the site, nor the detailed submissions made to previous local plan consultations and the call-for-sites submission.
- 3.8 We believe that subject to an iterative design process, the site is capable of accommodating up to 130 dwellings of which 45 would be affordable. Whilst we welcome the proposed allocation of Marley Road, it is clear that further refinement of site capacity is necessary.



## 4.0 **Strategic Policy 3 – Levels of Future Housing Development**

### **Support**

- 4.1 Whilst we acknowledge that the emerging Local Plan at face value appears to be capable of meeting the local housing requirement informed by Standard Methodology (18,920 dwellings) across the plan period we question the ability of the emerging Plan to ensure a steady supply of completions annually across the Plan period owing to a substantial reliance on new homes coming forward from strategic scale proposed allocations, namely a new settlement.
- 4.2 Whilst the latest consultation draft NPPF may in due course result in standard methodology forming a starting position, rather than comprising a minimum in the calculation of the requisite housing requirement it is clear there is need for a significant quantum of housing.
- 4.3 It is therefore vital that the emerging Plan identifies a wide range and choice of allocations to ensure that not only is the supply of housing boosted but it comes forward as planned to ensure a healthy and robust supply.
- 4.4 Elevating Exmouth to form a focus for new development as set out under our representations in respect of Strategic Policy 1 and 2 would assist in identifying a wider range and mix of sites that are deliverable more readily. Importantly, such sites do not require new infrastructure, but simply enhancements to accommodate/address the need being generated. We consider that Marley Road (Exmo\_04a) is one such site.
- 4.5 In the context of the ongoing NPPF consultation it is important that the requisite housing requirement and proposed allocations are identified in emerging Neighbourhood Plans. It is also important that emerging policies do not unduly restrict sustainable sites coming forward in the future over the Plan period.

## 5.0 **Strategic Policy 5 – Mixed use development incorporating housing, employment, and community facilities**

### **Object**

- 5.1 This policy sets out that all housing developments will be required to include provision for employment land unless certain exemptions apply. Developments within tiers 1 and 2 settlements comprising of 100 homes or more are required to deliver 0.4 hectare of employment land per 100 dwellings and developments under 100 homes will be assessed on a pro-rata basis.
- 5.2 The policy also details that developments will be required to deliver on-site social and community facilities in line with needs specifically generated by the development.
- 5.3 Whilst we support the aim of SP5 which is to promote sustainable patterns of development by reducing the level of commuting, we believe the proposed policy and its practical application needs further thought and refinement.
- 5.4 The proposed policy would deliver piecemeal employment land which is unlikely to have the necessary associated infrastructure and support networks to be attractive to prospective tenants/occupiers.
- 5.5 Disjointed business parks none of which would have the necessary critical mass to create a destination are unlikely to be delivered. Employment opportunities should be focused on public transport/active travel hubs. For example, whilst it may be easy for future occupiers of Marley Road to access the town centre, it would not be equally easy to access the site from a wider catchment owing to public transport limitations which are rightly focused on getting commuters to central hubs.
- 5.6 As it stands, Marley Road (Exmo\_04a) would be expected to deliver 0.52 hectares of employment land (based off 130 dwellings) which accounts for 5% of the total site area (10 hectares). According to the Council's evidence work 0.52 hectares of employment land would support approx. 130 jobs. However, it is unreasonable to simply assume that future residents would simply take up employment at the local employment opportunities created, meaning that the policy could in fact exacerbate unsustainable patterns of commuting for the reasons set out above.
- 5.7 It is also important to consider that a policy preference to provide employment land as part of housing allocations would significantly reduce a site's ability to deliver other policy requirements such as open space, affordable housing and sustainable urban drainage infrastructure. It is essential that these considerations are approached with pragmatism and considered in the wider planning balance rather than being utilised as a pre-requisite to support otherwise acceptable development.
- 5.8 We do note and agree with the exemptions, but feel that the proposed Policy is not necessary, with employment growth secured through traditional employment protection policies, allocations for new and/or extended employment parks and through windfall development in appropriate locations.

## 6.0 Strategic Policy 20 – Exmouth and its future development

### Support subject to amendments

- 6.1 SP20 confirms that Exmouth is expected to accommodate 1,033 homes across the plan period. As set out in our representations in respect of draft SP1 we do not consider that the proposed spatial strategy sufficiently distinguishes the sustainability credentials of Exmouth from other Tier 2 locations.
- 6.2 The Council’s own settlement hierarchy confirms Exmouth’s sustainability credentials by being the only tier 1 settlement in East Devon. As per paragraph 6.15 of the draft Local Plan:  
*“Exmouth is very well supplied with services and facilities with a large secondary school and primary schools, a variety of shops, sports facilities, a library, GP, hospital, railway station and regular bus services.”*
- 6.3 It is clear that Exmouth is an appropriate location to accommodate a substantial increase in planned growth which needs to be reflected in the spatial strategy and accord with the Council’s own settlement hierarchy. Indeed, Exmouth should be held in the same regard in terms of growth as the proposed new town and Cranbrook and comprise a ‘focus’ for new development.
- 6.4 Within the context of the need for Exmouth to accommodate more growth, we question why the Council sees the need to categorise proposed allocation in to ‘preferred’ and ‘second choice’ when clearly all identified sites are essential to the soundness of the emerging Plan.
- 6.5 Exmo\_04a is identified as a ‘second-choice’ allocation despite being free from constraints, sustainably located and capable of being readily deliverable.
- 6.6 Under SP20 Exmo\_04a forms part of a wider proposed allocation and must be brought forward as part of a wider comprehensive masterplan (Land on the north-eastern side of Exmouth). The mixed used development is expected to provide 258 new homes and 1 hectare of employment land.
- 6.7 Whilst our client supports the proposed allocation and the inclusion of Exmo\_04a, it is important that the masterplan does not prevent timely delivery of sites within the masterplan that are free from technical constraints. We consider that Marley Road (Exmo\_04a) is one such site:
- 6.8 **Site Access** - An existing vehicular access into the site is provided in the form of a gated entrance direct from Marley Road. Albeit pedestrian, cycle and emergency access could be achieved via Marley Drive and should therefore be included as part of Exmo\_04a.
- 6.9 The above approach was supported by Devon County Highway Authority in consultation responses to planning application (reference: 14/3022/MOUT). The Highway Authority confirmed that the proposed development would have “*safe and suitable access*”.
- 6.10 **Infrastructure** - The site is capable of being fully serviced and there are no infrastructure deficiencies or requirements.

6.11 **Flood Risk** - The site in its entirety is located within Flood Zone 1 (low probability of flooding having a less than 1 in 1,000 annual probability of fluvial or tidal flooding). Residential development at this location will be in full compliance with Government and Environment Agency planning policy on flooding.

**Ecology** - The site is free from any nature conservation or landscape designations.

6.12 As such, there are no technical issues associated with Exmo\_04a and it is able to come forward in isolation. However, we recognise the need for the wider site to be comprehensively planned and suggest that a concept masterplan is produced which is embedded into the emerging Plan that allows individual parcels to come forward in isolation post adoption and avoids unnecessary delay. This work could take place collaboratively in the run up to the Publication version consultation.

### **Site Capacity**

6.13 Whilst not specifically set out in the emerging draft Plan, the consultation website includes a link to a high-level assessment of the site which notes an indicative capacity of 70 dwellings and potential contribution to employment land. The basis of this capacity is unclear, and it does not align with the planning history for the site or our previous representations to the emerging Local Plan consultation process (including call for sites).

6.14 An outline planning application (14/3022/MOUT) for up to 98 dwellings was refused on 22 February 2016. Discussions with East Devon District Council were positive and all technical matters including ecology, flooding, landscaping, highways and heritage had been addressed to the satisfaction of officers. During the final stage of the determination period the current Local Plan Inspector's report was received by EDDC, following which the council refused the application on the grounds that they indeed had a 5-year land supply.

6.15 The decision was not appealed, to allow for time to pass and the opportunity to revisit the proposals at the appropriate time.

6.16 The outline application (as amended in June 2015) had a substantially reduced land cover than Exmo\_04a and therefore demonstrates that the capacity of the site is well beyond 98 dwellings. Further refinement of the enclosed framework plan would demonstrate how 130 dwellings can be accommodated on the site, of which 45 would be affordable.

## 7.0 **Strategic Policy 28 – Net-Zero Carbon Development**

### **Support subject to amendments**

- 7.1 Development proposals must demonstrate how they will address climate change mitigation and adaptation, encourage the decarbonisation of energy and transport, and support the delivery of a carbon neutral East Devon by 2040. Whilst we agree with the thrust of the policy objective, it is vitally important that the scope of the desired deliverables do not undermine the deliverability of viable development.
- 7.2 We note that the wording of draft SP28 presents the identified requirements (carbon statement and Whole Life Cycle Carbon Assessment) as all having to be satisfied/addressed as a prerequisite for major development to be supported. The detail to be expected in these statements should be proportionate to the form of a future planning application i.e., the level of detail that can be provided at an outline planning application stage will be limited compared to a full application.
- 7.3 In respect of the proposed allocation of Land off Marley Road, Exmouth M7 Planning is committed to delivering a scheme that seeks to positively address the Climate Emergency. The potential measures are discussed in detail below:
- 1 **Location:** Focused development along key sustainable public transport routes and the Cycle Network.
  - 2 **Construction:** Improved methods of construction to achieve carbon reduction.
  - 3 **Renewable energy:** Use of on-site renewable power generation, such as solar energy.
  - 4 **Home working choices:** providing sufficiently sized housing and adaptability to accommodate home working, to reduce unnecessary commuting.
  - 5 **Amenities:** access to allotments and amenities to reduce out-commuting.
  - 6 **Personal transport choices:** walking, cycling and electric car charging points.
  - 7 **Waste:** reduction and recycling emphasis.
  - 8 **Landscape:** re-wilding of areas to enrich habitats in suitable locations.
- 7.4 We consider that the proposed allocation and subsequent development of the site would align with the emerging Local Plan's climate change aspirations as per Strategic Policy 28 and the energy hierarchy.

## 8.0 **Strategic Policy 65 – Walking, Cycling and Public Transport**

### **Support with comments**

- 8.1 Proposed Policy SP65 seeks to limit the need to travel by incorporating the features of a “20-minute neighbourhood” in new development. The Policy seeks to prioritise walking and cycling links and access to high quality public transport services.
- 8.2 Marley Road, Exmouth (Exmo\_04a) embodies the desired 20 minute neighbourhood. The site is located in an accessible and sustainable location with an existing footpath along Marley Road where pedestrians can walk south, merging into Bystock Road and then crossing to Dinan Way. This allows for easy walking routes to Tesco Express and other local amenities.
- 8.3 The closest bus stops to the site are located on Dinan Way, within a short walking distance of 375m from the site. The nearest railway station is Exmouth Train Station, which has bus routes that pass near to Marley Road or alternatively is a 33-minute walk.
- 8.4 Primary education is available at Brixington Primary School approximately 0.5 miles to the south of the site. Secondary education is available at Exmouth Community College, approximately 2 miles from the site.
- 8.5 The nearest convenience store to the site is located on Pines Road, a 480m walk from the site. There are also additional facilities including doctor’s surgery, pharmacy, pubs/restaurants, and hairdressers within 1km. It is abundantly clear that the proposed Exmo\_04a allocation aligns with the aspirations of policy SP65.

## 9.0 **Policy 40 – Affordable Housing**

### **Support subject to amendments**

- 9.1 In respect of affordability, there is a crisis, and it is right that the draft Plan seeks to tackle this. The choices made through the emerging Plan in respect of scale and location of development will however have a bearing on the ability of future development to support an enhanced contribution of 35% towards affordable housing.
- 9.2 Whilst it is perfectly acceptable for the plan to be ambitious and to set a ‘target’ of 35%, this needs to be ascertained on a site-by-site basis with scheme viability a key consideration. We note however that the proposals for Land off Marley Road do aim to be compliant with the emerging affordable housing policy requirements of 35%.

## 10.0 **Policy 41 – Housing to meet the needs of older people**

### **Support with comments**

- 10.1 Whilst our client welcomes the recognition of the demographic profile of East Devon it is important the draft Local Plan does not undermine the deliverability of sites through rigid policy.
- 10.2 As it stands, draft allocations, as per Policy 41, are required to deliver at least 20% as specialist older person dwellings (Use Class C3). Specialist housing that falls within Use Class C3 is considered to be age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care.
- 10.3 There is a significant extra cost with specialist housing owing to the need for providing adequate communal facilities and in some cases on-site accommodation for essential staff. Furthermore, despite being specialist housing it is still considered Use Class C3 and is not excluded from the affordability calculations (point 11 of Policy 41). Therefore, a development, such as Marley Road, Exmouth, is now only capable of delivering 45% market housing when the elderly housing (20%) and affordable housing (35%) requirement is accounted for.
- 10.4 It is essential that the needs of the elderly are approached with pragmatism, and we welcome recognition within draft Policy 41 of the need to maintain development viability. It is vitally important that this is carried forward to the Publication version.



## 11.0 **Policy 44 – Self Build and Custom Build Housing**

### **Object**

- 11.1 This policy sets out that developments of 20 dwellings or more will be required to include a 5% provision for self-build and custom house plots.
- 11.2 Our client objects to the introduction of a self-build target within draft Policy 44. There is no legislative or national policy basis for imposing an obligation on landowners or developers of sites to set aside plots for self & custom build housing. Under the Self Build & Custom Housebuilding Act 2015 and 2021 NPPF (para 62), it is the responsibility of the Council, not landowners or developers, to ensure that sufficient permissions are given to meet demand. The Council are not empowered to restrict the use of land to deliver self & custom build housing. The NPPG sets out ways in which the Council should consider supporting self & custom build by “engaging” with developers and landowners and “encouraging” them to consider self & custom build “where they are interested”.

## **12.0 Policy 87 - Biodiversity Net Gain**

### **Support subject to amendments**

- 12.1 Our client supports the overarching objective of protecting and enhancing the natural environment and supporting an increase in biodiversity. However, the requirement set out in Policy 87 for development proposals to result in a biodiversity net gain of at least 20% could impact the deliverability of new development and restrict sustainable development from coming forward.
- 12.2 Therefore, our client requests that Policy 87 is amended to 'at least 10%' BNG, in line with emerging national requirements as set out in the Environment Act 2021. This will ensure that vital new development continues to come forward in the district. Nonetheless, our client strongly supports that the Policy allows for off-site habitats to be created or enhanced to provide BNG for new developments, ensuring flexibility for developers.



- |  |                           |   |   |   |                                    |   |   |   |                                   |
|--|---------------------------|---|---|---|------------------------------------|---|---|---|-----------------------------------|
|   | 1. Access to Development  |   | 5. Main Spine Road with Green Verges and Street Trees |   | 9. Potential pedestrian connection |   | 13. Marley Road - Cycle/pedestrian access to primary school |   | 17. Primary School                |
|  | 2. Residential Dwellings  |  | 6. Attenuation  |  | 10. Highway improvements           |  | 14. Kings Garden & Leisure                                  |  | 19. Primary School playing fields |
|  | 3. Pocket Parks           |  | 7. Footpath links                                     |  | 11. Higher Marley Road             |  | 15. Proposed allocation controlled by others                |   |                                   |
|  | 4. Country Wildlife Sites |  | 8. Existing landscape features                        |  | 12. Marley Drive                   |  | 16. Commercial  |   |                                   |



MR50009  
Marley Road, Exmouth

Framework Plan

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