

EXMOUTH TOWN COUNCIL

Consultation Response

Local Development Framework – Core Strategy



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November 2010

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Exmouth Town Council

Consultation Response - Local Development Framework – Core Strategy and

1. Consultation Process

The Planning Committee set up a process to enable considered responses to be delivered to EDDC on both the LDF and Licensing Review as follows:-

12 th October	Special Planning Committee to meet for first review:- 6.15pm to 7.00pm Licensing Policy Review 7.00pm to 7.15pm Public Question Time 7.15pm LDF Discussion
2 nd November organisations	6.30pm COLP meets to bring together comments of community
8 th November	6.15pm Working Party to receive comments and finalise recommendation to Council
22 nd November	7.00pm Town Meeting followed by Extraordinary Town Council meeting
29 th November	Exmouth Town Council to confirm this response
30 th November	Last date for responses

2. Initial Consideration - LDF

The Town Clerk prepared an initial report which was considered by a Special Meeting of the Planning Committee on 12th October attended by members of the public who had an opportunity to ask questions at the beginning of the meeting. The report was modified following the Special Planning Committee.

The Community Organisations Liaison Panel considered the report on 2nd November and further changes were made to the report.

The Planning Working Party met on 8th November and further updated the report to take account of views from Colp and from others in the town.

The Town Meeting tested the response to date with the electorate and further additions were made to the response.

3. Vision for East Devon to 2031 Chapter 3

The Vision contains wide statements which are generally acceptable and hard to disagree with 'Mother Hood and Apple Pie' but leave huge swathes of what, where, how and when

unanswered. How these high level statements are interpreted and translated into action is the important element which has always been the real issue in Exmouth.

Few could disagree with the sustainable community seven themes as overarching priorities but how will these be delivered?

Paragraph 1.14 refers to the production of a series of more detailed plans for East Devon. The Planning Committee found it difficult to be clear about the large scale housing developments proposed for Exmouth without being able to understand how the infrastructure needs would be met. Whilst recognising the need to provide for new housing to meet demand within the private market (an insatiable demand which needs to be limited taking account of the fact that Exmouth has already provided for the lion's share of housing growth for the district over the last few decades) and to provide for Affordable Housing there is a need for a much more sophisticated approach to understanding what that need might be.

There are two possible approaches:-

1. An educated guess linked to current housing need, making housing need the driving force for future development of Exmouth and accepting that new residents will go out of town for employment and services. In other words carry on growing Exmouth as a dormitory town with ever expanding housing estates. (A suburb of Exeter and the new community).
2. Look at the infrastructure as a priority and identify what is needed to redress the balance so that Exmouth can become more resilient and self sufficient as a town which can provide for, among other things, education, employment, health, leisure, sport, retail, traffic movement. The environment playing an important part with a commitment to embracing low-carbon living without increasing dependence on Exeter.

Council's Response

The approach 2 above is supported with the emphasis being switched from housing led to infrastructure led to provide the services needed for a town the size of Exmouth and to provide greater employment opportunities within the town. The approach where Exmouth is used to provide more housing as a dormitory of Exeter is rejected as a sustainable model for the future.

4. Key Issues and Objectives Chapter 4

Again the key challenges are eminently acceptable. How that is interpreted down the line is the key. For example Built Heritage says that 'we will seek to ensure new development is locally distinctive, high quality and enhances places'. In practice we can all point to examples where development has been allowed through the planning process which clearly does not respect the local distinctiveness. How can we make sure that this planning policy is effective with regard to local distinctiveness, maximising the use of low-carbon technology which promotes community resilience and becomes an integral part of the Exmouth brand in the longer term.

Council's Response

Whilst the key output objectives are laudable based on 'We Will' this raises expectations without identifying 'How we will' achieve these objectives.

5. Policy Context and Public Engagement Chapter 5

Largely factual information which is noted.

6. Spatial Strategy Chapter 6

The public view in the grey box in the LDF document refers to what East Devon residents said. Being a largely rural area it is no surprise that the majority view favours most development in existing urban areas. Also we understand that the number of respondents was low, providing a very poor base upon which to make conclusions. This overwhelms the view of the main towns which have for decades carried the load of extra housing without a balanced infrastructure in terms of community, leisure, recreation and employment. This creates **the self fulfilling prophecy** that Exmouth will once again face a **further** period of residential development which is detrimental to the overall quality of life which the town currently provides. The Local Plan identified that there is a need to provide a period of catch up in terms of services to balance the community. Overall in East Devon 16,400 new homes are planned in the Strategy period from 2006 to 2026 which is 186 hectares. The six main towns would accommodate 45% of new homes built in East Devon. 45% of those would be built in Exmouth. This represents nearly ½ of the requirement for the six towns when Exmouth is already the biggest town in East Devon by far. In terms of the whole of East Devon including the new settlements, Exmouth is being asked to absorb over 17% of the new housing requirement. Where is the evidence to support the sustainability of this level of development for Exmouth? Where is the proof that it would at least maintain the well-being of the community rather than decreasing the resilience of the community against the core principles of the strategy? **East Devon District Council needs to re-examine the housing figures now that the Regional Spatial Strategy has been superseded. Evidence is now needed to demonstrate what locally driven housing need actually is.**

We have looked at the summary vision and strategy for each of the towns and there is a marked difference in emphasis for Exmouth based on 'Substantial housing provision, including affordable housing for Exmouth'. Contrast this with Sidmouth where words such as 'Modest growth' and 'Modest Future Development' prevail. Care is being taken to protect the essential character of Sidmouth at the expense of Exmouth. Whilst this has often been expressed, never has it been expressed so starkly in a written document. The balance in the document seems all wrong and needs serious re-evaluation for Exmouth. The Exmouth pages of the adopted Local Plan reflect the needs of Exmouth much better than the Core Strategy Document seeks to do. Whilst the Preferred Policy Approach seeks to give numbers to housing requirements no similar quantification is given the requirement for Jobs, Town Centre retail/commercial facilities, social and community facilities with no mention of leisure/sport requirements, tourism needs etc. The use of words such as 'Significant' are meaningless against the specific numbers given to housing. At this stage it is premature to be talking numbers as there is no evidential justification for this provided with the Core

Strategy document. Either the document reflects broad policy objectives or not. If it is just broad policy objectives then we would expect a series of detailed studies to be carried out to prove the need and identify the implications.

Budleigh Salterton has effectively been ruled out of the equation by not being designated as a town and described as a Rural Hub and yet its scale is no less than Axminster for example. It is difficult to understand this logic.

Rolle College Site and recreational ground off Douglas Avenue are obvious sites screaming out for designation to protect them from Residential Development. Rolle College needs to be identified for education/business/community use urgently to protect it from residential development. The recreational grounds need to be protected for leisure. With such protection then a community led solution can be implemented for Rolle to replace the loss to the economy by the withdrawal of the University of Plymouth. The speed of sale of the University of Plymouth halls of residence has resulted in an expedient approach to those sites as we have not had a plan in place to meet the situation which has arisen. That has left us all in the hands of developers seeking residential/care home uses.

Council's Response

The future of Exmouth within the spatial strategy has been dominated by expansion of areas for housing more than any of the other towns in East Devon and this is rejected as the right model for Exmouth's future. How this can meet the Balanced Communities Preferred Policy Approach – Draft CS 4 - is hard for the community to understand as all are aware of the lack of balance already prevalent in Exmouth.

Whilst it is **recognised** that to meet housing need in the District, Exmouth will have to accept some new sustainable development there is a serious question mark over the scale being proposed which, with brown field sites, is considered to be excessive. There needs to be a section which identifies how the number of new houses proposed has been arrived at, with evidence that this level is beneficial to the well-being of Exmouth.

How can Exmouth bear the brunt of new residential development given the inadequacy of its current infrastructure and recent losses?:-

- Magistrates Court moved out;
- Job Centre moved out;
- Rolle College closed;
- County/District services being rationalised;
- Library insufficient for size of town;
- Sports centre facilities dated and tired;
- Ratio of jobs to households already poor;

- Growth of care homes and overdevelopment of elderly flats
- Possible Closure of a local respite facility.

Council's Response

- 1. Current master planning should help to redress the socio/economic balance in the town without substantial further residential growth.**
- 2. The balance of new housing across the six main towns (and Budleigh Salterton) in the District needs to be revisited.**
- 3. Exmouth's current services do not meet peoples' needs so this policy is very important to turn Exmouth back into a more balanced community. This policy does not link comfortably with the document's ambitions for new housing in Exmouth. Space needs to be provided for new schools, Dr's surgeries, dentists, improved hospital, community facilities, open spaces, employment land and leisure.**

7. Development at East Devon's West End Chapter 7

Employment opportunities and housing provision planned for the West End is accepted as necessary. We also need to think how the coastal towns can link with and benefit from the new towns. The danger for Exmouth is that the idea of balancing the economy will be undermined by all business investment being driven to this area. Already the scarce time available for the few officers capable of dealing with regeneration issues is being absorbed by the 'New Town' developments. The resources to facilitate wider economic development simply are not available.

Council's Response

There is a danger that coastal towns will be overlooked through lack of resources and the potential benefits arising from the West End will fail to deliver opportunities for them also and continue the dormitory effect increasing commuting on already congested highways.

8. Exmouth Chapter 9

The initial vision and strategy paragraph needs to be revisited. Surely the key vision should be one based on low-carbon, employment/community led regeneration with housing a means to an end but not an end in itself. The focus on housing should not be in encouraging inward migration but towards providing housing fit for people to live and work in the town creating a resilient community. If the employment led regeneration is based on low carbon principles it will both attract business to the town and support the branding of Exmouth as an attractive and sustainable place to live and work. This whole question around the philosophy of accepting housing for housing's sake is critical to the response from Exmouth.

Council's Response

- 1. The emphasis of the vision and strategy needs to be changed towards employment and social infrastructure with housing need in Exmouth being substantiated based on evidence. Dinan Way completion continues to be important to Exmouth however it is funded.**
- 2. The Exmouth Now aspirations are self evident and are supported subject to a reference to the Jurassic Coast World Heritage Site being included under 'Outstanding Environment'.**
- 3. Suggested land allocations are all on sensitive countryside which provides a green lung around Exmouth defining its extremities and preventing further urban sprawl so prevalent in many other areas of England. The sheer scale of development at St John's Road and Littleham Valley is of major concern in terms of its encroachment into the countryside and urban sprawl and should NOT be earmarked for development. (development in this area does not sit well with core principles in 16.5 of the Core Strategy).**
- 4. With the Regional Spatial Strategy now defunct the numbers of houses identified as being required for Exmouth is now redundant and should be abandoned and revisited based on evidence of local need.**
- 5. We are not confident that the aspirations of the preferred policy approach will be delivered because of the poor track record of the past.**
- 6. The implication that new housing will help to pay for the existing infrastructure needs of the town cannot be proved as there is no viability testing to back this up.**

9. Smaller Towns and Villages and Countryside Chapter 14

Those settlements depend on the larger towns for services so any developments within them should contribute to the provision of those services in the main towns.

10. Ensuring we have Thriving Communities Chapter 15

1. Council's Response

Tourism will be supported by the Core Strategy but this is not being followed through by actions either by the District or County Council. As a key industry in this part of the world the Local Authorities should be playing a leading role in facilitating sustainable tourism.

- 2. Care Homes provision in Exmouth at 150 hardly points towards balancing the community which will put extra strain on the health and social services and skew the population balance of the town dramatically. Again Exmouth is being targeted as the town which has to deal with more than its fair share of the social issues of East Devon. It is as if the vision for East Devon applies to every other settlement but that Exmouth is the exception. This is not acceptable.**

3. Under education and health, no thought is given to higher education in the town. Excellent facilities still exist at Rolle College and it seems acceptable to commute our vocational students elsewhere. The Core Strategy should review this policy urgently as a whole age group is being shipped out of town at a critical age which will lead to further unbalancing of the population.
4. The scale of housing being suggested would have significant impact on the need for education provision for all age groups and stronger references to this need be made. There seems to be an assumption in this section that education needs will be reducing across East Devon. Exmouth as the major settlement in East Devon requires special attention if it is to improve its potential as one of the main economic drivers for the district. The policies in the core strategy are more likely to weaken rather than strengthen the town's position in the District.

11. General Comments

The Core Strategy is full of good ideas but with little practical follow through demonstrated. Also the evidence base for many of the statements is lacking. Whilst public consultation has found out some of what some people think and say, these thoughts need to be researched and backed up with hard evidence. For example, what are the figures behind housing need and how many starter homes/affordable variants should be provided to meet local need?

Council's General Points

Housing – Housing need evidence is required and an understanding of what the market might require for private housing in the plan period. Housing Associations are tied with their allocations policy and new affordable houses will only address part of the housing need in this area and will be required to deal with housing need arising from other areas also. **The lack of Council rented accommodation is a given.**

Employment- How many jobs do we need to create and what land needs to be set aside to meet the need? We know an expansion to Liverton Estate is planned but if large development **were to be allowed to** occur at St Johns Road then how much **would** be set aside there for employment.

In an area of full employment it is easy to overlook the question but this has a lot to do with sustainability and providing jobs near to where people live and not about adding to the commuting mindset which currently exists.

What should happen when an overriding opportunity arises which may be outside of the Core Strategy?

The Strategy needs to be strong enough to be protect the character of the town and the area but also flexible/tactical enough to allow for opportunities to be taken which will provide jobs when these present. The opportunity cost in such cases needs to be clear. The applicant in such cases will be strongly required to mitigate for the losses which occur to the area in a way which will compensate and even enhance other parts of the town/area.

Education – What is the education need? Does the Beacon School and or Exeter Road School need to be replaced and do we need new primary school(s) how does that relate to the expected housing provision? If the Housing estimated were to be delivered what would be the plan to deal with the secondary educations impacts.

Social and Health Care – What provision is to be made for Doctors, Dentists, Health, Social support and where will the centres for these be placed. The current Hospital provision is inadequate and needs review.

Leisure – What level of leisure provision can we expect in town and in the further extremities of the town outdoor and indoor. A strategy for leisure and sport is needed.

Tourism – We need to understand the importance of tourism for the town and how many jobs/bed spaces we can expect the industry to deliver.

Transport – The Vision and Goals of the emerging Third Devon and Torbay Local Transport Plan for Market and Coastal Towns are to support economic growth and to tackle climate change. The LDF needs to refer to the improvement of transport interchange facilities in Exmouth as part of the town’s regeneration. Sustainable transport outcomes need to be included as part of any development proposals which are put forward for the town to include walking, cycling, buses and access to rail facilities.

Environment – What level of local power generation are we looking at and where? How do we protect wildlife diversity and where will the provision be to create sites for this which are linked to allow wildlife corridors. The Valley Parks idea is ‘Nice’ but is not worked through with any scientific backing. What are the connections with wildlife diversity and the well being of people?

Paragraph 16 largely talks about Biodiversity and Geological Protection in the countryside but does not think this through into urban environments where there is great potential to encourage habitat for wild life in urban areas for the benefit of indigenous species and for the well being of people through connection with the natural world. **The Valley Parks provides a good example of land which should continue to be protected for this purpose. Having said that, this is no alternative to protecting valuable countryside on the edge of town to allow development in areas such as St John’s Road and Littleham Valley which are categorically not accepted as being developable.**

What are the potential flooding impacts of development in the Withycombe Brook catchment? The natural absorption of precipitation will be removed creating impact on drainage and water run-off which will have serious implications for existing disposal works and sewerage infrastructure.

The interrelationships between the environment, the economic potential of Exmouth’s natural environment (eco-tourism) and the well being of all sections of the community need to be recognised in the proposals being made.

12. The Core Strategy – Delivery

The core strategy sheds little light on the next stages of the LDF process. What further documents are required? What further studies are needed? What resources will be required to deliver the plan and make sure it is more than a theoretical document? Our current example of failure to do this is the Local Plan which identifies Valley Parks but provides no resources to deliver. A policy without a plan to deliver will sterilise land and leave it unmanaged and subject to other uses filling the vacuum resulting from expediency. Exmouth Marina, Hillcrest residential development and Rolle College are all examples of the town's future being left at the behest of market forces.

There is great concern that without a **viability statement** it is impossible to evaluate what may or may not be deliverable. Assuming all the houses identified for delivery in the plan period were built then what value would that yield for all the infrastructure needs which have been identified? How much can we expect to be delivered from the private sector and how much from the public sector? In the current financial climate public funding is for all intents and purposes frozen however that will be the case until the National Balance of Payments is restored to a healthier position. Therefore there have to be assumptions that the Public Sector will take some responsibility for infrastructure. Some projections need to be made in the sense of a business plan. After all no prudent local authority would do business with the private sector without testing the financial viability.

13. Development Gain

A key vein running through the report is that there will be planning gain from development to pay for infrastructure. A basic calculation suggests that the yield from housing development would barely pay for the Dinan Way link completion let alone all the other service needs that the plan identifies.

14. Community Organisations Liaison Panel (Colp – Feedback)

The Community Organisations Liaison Panel on 2nd November considered this report and individual responses from the Community Organisations which would be submitted to East Devon District Council independently. There was support for this Exmouth Town Council response with some adjustments to be made to enrich it with a sustainable thread based on low carbon/low energy emissions running through it.

There was **serious** concern about the emphasis on housing in the core strategy which was considered to be given prime status whereas regeneration and the lack of service provision for the town and hinterland, as it is now, were considered to be of greater importance. People could not understand why unremitting growth into special landscape had to be countenanced. There was a feeling that the perceived wisdom had to be challenged to prevent urban sprawl.

The correct amount of development to provide affordable housing and to balance the private market needed to be anticipated without destroying the environment and character of the town which makes it a desirable place to live in the first place.

It was recognised that Exmouth could play a strong part within East Devon in terms of being an active economic player but the part it would play would need to be carefully understood.

A summary of the comments of the Community Organisations follows:-

- Brixington and Bystock Action Group
 - Housing provision planned is disproportionate to the rest of East Devon;
 - Affect on landscape quality;
 - Affect on flash run off into Withycombe Brook increasing flood risk along the length of the brook;
 - Housing in St John's Road area on the scale proposed would put excessive demands on education, highways, traffic volumes, employment and burial facilities.

- Brixington Improvement Group
 - While the need for Social and affordable housing is understood for Exmouth people there is no case made for large scale housing developments.
 - East Devon over the years has allowed large developments in Exmouth without any infrastructure. In addition the County Council has already stated that the Dinan Way link will not be completed in the near future.
 - In the current financial climate it is unrealistic to think that any substantial improvement will be forthcoming.
 - There are many planning proposals already in Exmouth which have been approved, plus Brown field sites which appear to have been overlooked.
 - Residents would not support any developments until these alternatives have been fully used.
 - There is strong feeling that St John's Wood is a haven for wildlife and trees together with Withy Brook and ponds .
 - District Council have already run rough-shod over such areas in Exmouth and enough is enough.
 - Any increase in housing must come with a new Hospital and two primary schools. A new community college, library and sports facilities would go some way to underpin the largest town in Devon.
 - South West Water must undertake a review of the infrastructure in Exmouth as two overflows have happened this year.

- In short Exmouth must not be the dumping ground for East Devon and Exeter, a widely held view in the Town and this document does little to help the position.
- Exmouth Citizens' Forum
 - Understanding of the importance of the Coastal Zone
 - Focus on shoreline – welcomes broad proposals that indicate the District Council's understanding of the Coastal Zone;
 - Concerned about the detail and contents of LDA Master Plan;
 - Concerned about detail of retail provision and potential impacts on the coast;
 - Does not consider case proved for a new supermarket;
 - See proposed supermarket as possible threat to the estuary dependent on its location;
 - Want jobs not only in retail but which will include a wide range of skills;
 - Emphasise need for Core Strategy to conserve, protect and enhance Exmouth's surroundings including our coastal zone.
- Exmouth Civic Society
 - In view of Comprehensive Spending Review concerns that viability of LDF will be a problem;
 - Do not agree with the assessment of the vision for Exmouth;
 - Concerned about lack of supporting evidence;
 - Emphasis on supporting Exeter – when Exeter should be supporting its neighbours in East Devon to help them prosper;
 - A30 road and rail corridor could take more housing development close to area of economic activity;
 - Substantial housing provision in Exmouth is inappropriate;
 - Exmouth needs medium scale employment growth and affordable housing for town's people;
 - Need to cover transport links with Exeter, tourism promotion;
 - Concerns about aging the population age group;
 - Various detailed concerns about how various policies to enhance the town can be achieved;
 - Villages have a part to play in fulfilling housing need;
 - Green buffer needed at St Johns Wood area.
- Exmouth Community Association

- The Exmouth situation requires much greater consideration based on its position and its role in the area;
 - The vision shown for Exmouth does not fit the Core Principals;
 - The housing rationale is not substantiated;
 - Housing strategy proposed strains infrastructure and creates more commuting;
 - Current affordable housing policies are not having the desired effect;
 - The summary vision does not fit the description of and objectives for Exmouth;
 - There is a deficit of infrastructure now in Exmouth;
 - Employment creation requires infrastructure based on the needs of Exmouth/East Devon's people;
 - Education and Health needs to be provided for;
 - Community and Recreation facilities are needed;
 - Transport in integrated hub is needed;
 - Local Resilience to climate change needs to be forethought;
 - Coastal defences must be designed to enhance the town's built structure;
 - A biodiversity plan is needed to understand the connections between habitats and promote linkages;
 - Design and Built Heritage policies CS35 and 36 are good;
 - Outstanding Environment – it should be a designated planning principle not to put protective environmental designations at risk nor to damage the historical built environment.
 - Meaningful consultation on core strategy has been lacking and superficial.
 - Established environments provide opportunities for innovation, and adaptation and this needs to be recognised.
- Exmouth Residents Association
 - No response received at this point
 - Transition Towns Exmouth
 - No response received at this point.

15. Town Meeting held on 22nd November 2010

A town meeting attended by around 60 people from all areas of the town and Town Councillors was held in the Council Chamber Town Hall, Exmouth on 22nd November. This allowed the Town Council's response to be tested against public opinion in the town. Here

follow various points which were raised which were generally accepted by the Exmouth Town Council subject to confirmation at its meeting on 29th Noember.

(1) Brownfield Sites

There is no policy for Brownfield Sites in the plan which identifies opportunities to release equity for public gain. Some of the examples may appear in the more detailed regeneration master planning reports due out soon. Examples were given:-

- Sell magistrates court and police station for private development and relocate operational police requirements to Liverton Business Park with other emergency services. Provide police presence in town in a shop unit.
- Relocate hospital to Goodmores Farm releasing current hospital site for development.
- Relocate Rugby Club to allow use for Town Regeneration.
- Relocate Bus Depot for Town Centre Regeneration.
- Earmark part of Rolle Site for Education/Business/Community uses.

(2) St John's Road and Littleham Valley – Areas identified as Developable

A strong response with unanimity at the meeting that this area should NOT be allowed to be opened for development because:-

- Highways are insufficient in all respects to allow reasonable access in or out and will cause greater congestion over the common B3180 and on A376 without any prospect of improvements to these roads;
- If opened to development would result in largely speculative housing development adding to pressures on all services in Exmouth and contributing little gain to mitigate loss of this land to the countryside;
- Increased pressure on services without enough funding to improve them;
- Would destroy countryside (St John's Road) once an AONB and with significant diversity of wildlife not dissimilar to Bystock Ponds which is an important Devon Wildlife Site;
- Concerns about water runoff, drainage, sewerage and effect on town below the area.
- Devon Wildlife Trust survey suggests designation of the area as of Biological importance.

(3) Recreation Grounds

Request for Recreation Grounds and valuable open space to be identified and to be protected from development bearing in mind the density of development in many parts of Exmouth and the need for green lung areas.

(4) Housing

There is an understanding that some new housing will be needed in Exmouth to help with Housing need particularly affordable housing. This question of how much housing is acceptable is now open for local determination so needs to be based on evidence. The nuance should change to supporting people to live and work in the town rather than creating dormitory housing encouraging significant amounts of commuting. Also there is an insatiable demand to live in attractive coastal areas which will increase the age demographic. Just building more houses for sale will encourage the increasing desire to use Exmouth as a town to retire too rather than a place to live and eventually retire in.

Whilst three large sites have been identified for future development, surely it would make more sense to identify what already exists in the town as there are many small sites which are developable and these should be highlighted before even considering green field development.

There is a need for a clear policy on houses in multiple occupation, the development of which is causing problems of intensification of population in already congested areas of the town.

(5) Employment Land

Where there is employment land such as Pankhurst Close which has in the past been more successful than it currently is, this should not be overlooked in favour of Greenfield sites where there is potential for regeneration. Also there needs to be care taken to ensure that, where possible, employment sites should be provided for producers as opposed to retail parks where full time opportunities are reduced and employment numbers may be low. Maximum employment opportunities should be sought from the limited economic sites we do have.

(6) Seasonality

No allowance is made for seasonality in the plan and the large expansion of population in the Spring, Summer and Autumn arising from Devon Cliffs one of the largest leisure complexes in the country. Traffic congestion particularly at Littleham Cross have not been considered and any new development in the Littleham Valley would only exacerbate traffic/highway congestion. Are we really going to allow development to keep increasing until serious traffic congestion results?

(7) Community Plan

Exmouth is working on a community plan for the town. The Community Organisations Liaison Panel has already provided a strategic plan and action plan adopted by the Town Council which provides a framework which will guide the plan process. These documents should be attached to the LDF as they indicate the local vision for Exmouth rather than one imposed from central policies.

(8) National Trust Land Bequeathed by Farmer Long

This land should be identified as land for open space which should not be developed whilst recognising possible partnership work with the National Trust to create better public access opportunities and possibly allowing improvement of the land for the benefit of wildlife.

(9) Flooding

Without any study on flooding implications it was considered to be foolish to be considering further large scale development above Exmouth. Whilst Environmental Impact Studies are required at Planning Application Stage this indicates a weakness of the Planning system. Without understanding the implications at the outset it is seen as irresponsible to identify large areas of land for potential development. Any development should not increase the vulnerability of any part of Exmouth to flooding.

(10) North Somerset Example

East Devon District Council should look at the North Somerset example which is post Regional Spatial Strategy.

North Somerset has amended its draft Core Strategy from 27,000 dwellings (RSS) to 13,400 and seeking more infilling. In respect of revised growth of Weston (Exmouth's equivalent in terms of its size and role) it has linked housing to jobs, used up to date economic forecasts and linked to their housing model. Environmental capacity testing had already been done. Also it has recognised that many non-economically active households still wish to move to North Somerset (retirement and life-style change), but also that this demand will always outstrip supply. With the RSS being abandoned this provides EDDC with new opportunities to significantly change the Core Strategy to reflect local wishes rather than being driven by central government policy.

(11) Population Growth

The issues report leading up to the previous Local Plan identified population increases from 1971 to 1998 as follows:-

Budleigh Salterton	800
Sidmouth	1,400
Exmouth	6,000

Exmouth has already taken more than its fare share of population growth and continuous increase outside of the built boundary needs to be checked.

16. Incongruence at Strategic Level

Affordable Housing Dilemma

The Community finds the whole basis of the Core Strategy hard to rationalise taking into account the bigger picture over time and whilst attempting to be strategic is actually reactive in nature. To explain this here are two examples:-

(1) Affordable Housing Dilemma

- There was a significant provision of affordable housing in our towns and cities (Council Houses) Government Policy changed to sell these off and to change the rental structure towards market rent level. Housing Benefits have grown exponentially to support those who cannot afford their rents/mortgages.
- Council Housing was significantly sold off.
- It is now widely accepted that there is a lack of affordable housing in our towns and cities particularly in the South of the Country and policy suggests that more is needed but there are depleted public funds to pay for this so this has to be provided as a proportion of private sector development.
- It is now being found with the slump in house prices that the public gain from private sector development is not going to pay for what was expected leaving lack of funds both at private and public sector level.
- The Core Strategy seeks to address the affordable housing issue with more development by expansion of existing towns creating yet more urban sprawl and the potential social problems that this will bring.
- The local view is that allowing valuable green land to be opened up for development is sticking plaster to try and resolve mistakes of the past which will damage the town rather than protect it.

(2) Rolle College - Site

This site has an existing educational use but not so identified in the Local Plan. There is a need for some of this land and buildings to be retained to support the community and its loss to housing will exacerbate the lack of infrastructure to provide jobs and support the town. We cannot in planning terms allow this to drift into housing but also need to make sure we find a viable solution which will avoid the site from being sterilised and left vacant. It should be identified in the Core Strategy for community/education/economic uses and not omitted as it was in the Local Plan.

The University of Plymouth for many years denied that the site would ever be sold off and it is this kind of corporate behaviour where they have now put the site on the market that has created mistrust within the community about future plans. The Core Strategy needs to be

able to provide real strength to support the wishes of the community and to be clear to the private sector what is possible and what is not.

We understand that new legislation will provide the opportunity for neighbourhoods to provide plans within a template format. It is important that the local community does just that to include the Rolle site. This should help to provide control over the land for community use. We would seek a designation of the part of the land which Rolle Exmouth Ltd has outlined for community uses within the LDF to overcome the current lack of statutory designation. It is important that there is planning policy clearly identified for this site. In the interim work will be done to expand the Avenues Design Statement to include the Rolle Site.

17. Conclusions

(a) **The key question is the sustainability of the amount of housing proposed in the Core Strategy and the ‘threat’ that without it other infrastructure will not follow. The balance has to be between what is actual housing need and the need for ‘Affordable’ Housing. Exmouth is being hit too hard with housing requirements and the old attitudes of looking to Exmouth to solve the social problems of East Devon are being continued. How far is Exmouth prepared to go to obtain better services and why should the town have to pay for services which are there to serve a much wider hinterland? Judgements have to be made on this and the figures quoted for housing are too high a price to pay. Exmouth should not be sacrificed for the rest of East Devon.**

(b) Compared to other towns, Exmouth is being seen as the main new housing provider for the District outside of the new town. Housing numbers are still based on the Regional Planning Strategy figures and the opportunity now exists to reduce the numbers based on local need. Exmouth’s unique qualities are not being recognised as they are for Sidmouth and arguments which are good for Sidmouth and other towns are also good for Exmouth.

(c) Exmouth is **NOT** able to **accept** the Core Strategy as currently written in respect of those parts relating to the town, because;

- **St John’s Road and Littleham Valley are not accepted as suitable areas for major growth of Exmouth;**
- **Major residential growth to the extent proposed is rejected;**
- **The areas identified are a charter for further speculative residential development. ~~Without being clear what land is developable and for what purpose, it would be irresponsible of the town to agree to the areas identified for further development as an expedient to seek to build ourselves out of failed housing policy at national level;~~**

- **There needs to be an agreement in place to ensure that Liverton Business Park Expansion will be protected for bus station transfer and to relocate other uses from the Town Centre to facilitate regeneration;**
- **Any new housing land needs to be controlled to ensure that the main purpose for this will be to provide low carbon build affordable housing;**
- **There should be a clear correlation of housing numbers with housing need to provide for people wishing to live and work in the town;**
- **Part of the Rolle Site needs to be identified for education/community/business uses to enable its potential for the town to be realised.**
- **There needs to be a section covering Public Transport as identified above to ensure incorporation within the emerging Local Transport Plan.**

(d) The Core Strategy to be credible needs to identify that this is an overarching document and that there will be a series of documents covering identified areas. It needs to be clear that the preferred policies from this document will result in further research and study to develop a more detailed approach which will be backed up by evidence scientifically gathered. At this stage it is far from clear that there will be significant work done to drill down deeper into understanding the needs for Exmouth and that policies will be based on general estimates rather than strongly based facts;

(e) A viability document (business plan) should be written which identifies where responsibilities for delivery lie and how funding is expected to be achieved. Without this all we will have is a planning document with large amounts of it being undeliverable.

(f) There needs to be a strong delivery team to drive the LDF when completed as this will become policy for all local and public authorities and the private sector.

(g) There needs to be a strong team to negotiate for community gain and S106 which understands what would mitigate against planning loss.

(h) In view of (f) and (g) it is difficult to know, with current resources, how the LDF can be delivered effectively. This leaves a fundamental weakness in the whole process.

18. Tail Piece - Final Questions Arising

1. Where significant development sites are identified would it not make sense to ensure that the ward(s) concerned are circulated to advise them of the consultation process or to carry out road shows to these particular areas to explain the thinking behind the proposals? Is any further 'Deep' consultation being carried out at this stage?
2. Would it be worthwhile convening a meeting of all Towns to discuss the balance of requirements across the District from a Town point of view?

3. Why is there no background information provided such as demographic projections linked with Housing Needs information and trends?
4. One dwelling one job is a noble aim but has this really been thought through in any detail to see if it is remotely achievable in Exmouth? Also many households now depend on two jobs thus adding to the employment question wherever more houses are built.
5. What thought has been given to the Education provision from primary through to secondary and further education and how these needs would be met with more development?
6. Has any thought been given to the viability in terms of S106 yield from development bearing in mind that significant expenditure would be required to build a Dinan Way link alone let alone covering the needs for schools, health facilities etc? Without a viability assessment the document lacks credibility and would if approved in current form be a charter for more housing development.
7. What input will come from the Public Utilities especially South West Water in terms of water supply and sewage disposal? There are local concerns about current capacity issues in terms of sewerage, sewerage treatment works and surface water run off and have the Utilities been invited to advise how they would deal with their infrastructure issues? Will the low lying areas of the town be affected by increased flood risk and how will this be assessed?

8. Emerging Government Policy. How will this affect Local Authority plans?

- For example for rewards for homes New Homes Bonus where the government will match the council tax from new homes for the first 6 months through the new homes bonus. Will Councils see this as a way to retrieve the lost income opportunities to support their own organisations or will they invest this in the communities concerned? Will this create a new era of affordable/public rented home construction?
- Tax Increment Financing - By returning the Business Rates to Local Authorities will this provide income that can be borrowed against to invest in capital projects for regeneration and social benefit?
- Will the first point drive policy from a central rather than local point of view?
- **New Localism Bill – will it give us the opportunity to change the focus of the LDF to meet local needs.**