

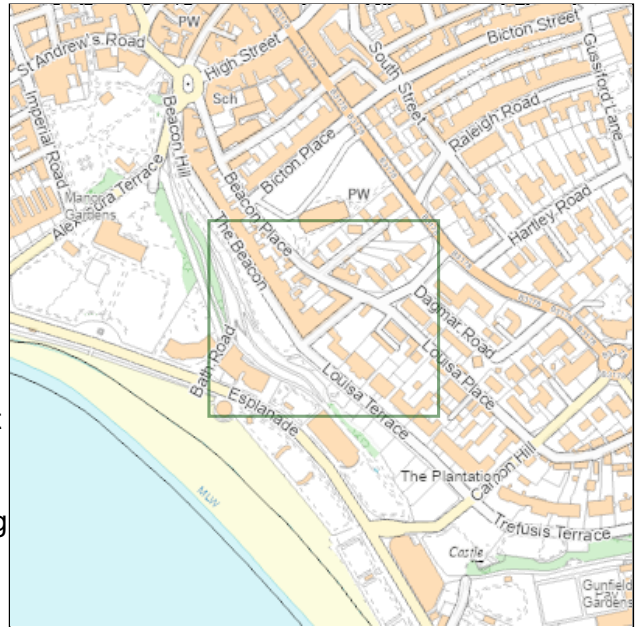
Ward Exmouth Town

Reference 25/2397/MFUL &
25/2398/LBC

Applicant Mr Keith Richardson (Richardson Hotels Ltd)

Location The Royal Beacon The Beacon Exmouth EX8
2AF

Proposal Change of use, associated demolitions and
proposed conversion of grade II listed hotel, to
19 no. 1,2 and 3 bed apartments with basement
storage, associated parking and infrastructure;
demolition of rear modern block to provide 2
newbuild semi-detached mews houses including
integrated garages



RECOMMENDATION: Approval with conditions



		Committee Date: 07.07.2026
Exmouth Town (Exmouth)	25/2397/MFUL & 25/2398/LBC	Target Date: 12.03.2026
Applicant:	Mr Keith Richardson (Richardson Hotels Ltd)	
Location:	The Royal Beacon, The Beacon	
Proposal:	Change of use, associated demolitions and proposed conversion of grade II listed hotel, to 19 no. 1,2 and 3 bed apartments with basement storage, associated parking and infrastructure; demolition of rear modern block to provide 2 newbuild semi-detached mews houses including integrated garages	

RECOMMENDATION: Approval with conditions

EXECUTIVE SUMMARY

This application is before the Planning Committee owing to the officer recommendation of approval being contrary to comments received from the Town Council.

Approval is sought for the change of use of The Royal Beacon Hotel and the conversion and alterations of the building to form 19 apartments and 2 new build dwellings on the site. The building is Grade II listed and sits within the Exmouth Conservation Area. The hotel forms part of a terrace of 23 properties along The Beacon, built as high status houses when Exmouth became a fashionable seaside resort in the latter half of the 18th and 19th centuries.

The layout of the existing hotel would be reconfigured to form 19 apartments, and an existing utilitarian accommodation block to the rear would be demolished and replaced with two new build mews houses.

The application has demonstrated through evidence of marketing and viability evidence that the existing hotel use is no longer economically viable, therefore the principle of the change of use from hotel to residential accommodation is considered to be justified and would comply with Local Plan Policy E17 Principal Holiday Accommodation Areas.

The scheme has been designed to respect the architectural and historic significance of the building, with key elements of significance such as the principal elevation being retained and enhanced. The new build element to the rear is considered to represent an enhancement to the character and appearance

of the site and the wider conservation area. The proposal would allow for the repair and rehabilitation of the heritage asset and put the building into a viable use consistent with its conservation.

The proposal provides an acceptable standard of residential amenity for future occupants and to neighbouring properties. The existing hotel provides just six parking spaces for staff and visitors, and the proposed scheme would provide one space per dwelling, which represents a significant improvement over the existing situation.

Overall, the proposal represents a sustainable form of development that would secure the long-term future of a prominent heritage asset, and enhance the character of the conservation area. Subject to the imposition of appropriate planning conditions and obligations, the development is considered to comply with policies contained with the East Devon Local Plan and the Exmouth Neighbourhood Plan, and is therefore recommended for approval.

CONSULTATIONS

Local Consultations

Parish/Town Council

Meeting 05.01.26

Objection: Members believed the number of proposed apartments constitutes overdevelopment of the site. Furthermore, there was concern regarding the absence of a thorough historic investigation, which risked erasing or damaging heritage assets without proper consideration.

Parish/Town Council

Meeting 13.04.26

Objection sustained, the proposal was still considered to be overdevelopment of the site.

Parish/Town Council

Meeting 26.05.26

Objection sustained: Members remained concerned that the scale of the proposed development would result in increased traffic movements and on-street parking within a highly constrained area, in close proximity to The Beacon Primary School. It was also not evident that all heritage-related concerns had been fully addressed.

Technical Consultations

County Highway Authority

09/02/2026 – Objection – concerns re visibility splays from Mews House garages

25/05/2026 – No Objection

Conservation

20.02.2026 - Principle of the conversion is accepted, but concerns raised regarding extent of internal demolition and subdivision, along with the design of the new buildings at the rear.

05/06/2026 – No objection, subject to conditions

DCC Historic Environment Officer

05.01.2026 – No objection subject to conditions

Devon County Council Education Dept

09.01.2026 - DCC has forecast that there is enough spare primary and secondary capacity to accommodate the number of pupils expected to be generated from this development.

DCC Flood Risk Management Team

22.01.2026 – Objection

24.04.2026 - Objection

28.05.2026 – No objection subject to condition

Economic Development Officer

11.05.2026 - No objection

EDDC District Ecologist

06.05.2026 - No objection subject to condition

EDDC Recycling & Waste Contract Manager

02.04.2026 - No objection subject to condition

Natural England

24.12.2025 –Further information required

13.04.2026 - Further information required

12.05.2026 - Further information required

27.05.2026 - No objection

Environmental Health

10.04.2026 - No objection subject to conditions

Historic England

19.12.2025 - No comment

NHS Local (Eastern Locality)

15.01.2026 The GP surgeries within the catchment area that this application would affect, currently have sufficient infrastructure capacity to absorb the population increase that this potential development would generate.

LPAE-Devon (Torbay+South Devon NHS Foundation Trust) Housing

06.01.2026 - Royal Devon University Healthcare NHS Foundation Trust seek a contribution of £ 5,361 towards healthcare services.

Police Architectural Liaison Officer - Kris Calderhead

07.01.2026 - Objection

08.04.2026 - No objection subject to conditions

South West Water

19.01.2026 – Objection re surface water disposal

Other Representations

12 third party representations have been received, in objection to the proposal.

A summary of ground for objection is as follows:

- The proposed number of dwellings would represent an overdevelopment of the site.
- The number of car parking spaces to serve the apartments is not sufficient, and additional cars seeking on street parking would negatively affect the safety, and overall amenity of existing residents.
- It is misleading to suggest that the normal parking ratios can be ignored because of the existence of car parks, on street parking and public transport.
- The proposed flats are very cramped with inadequately sized bedrooms.
- Access to the building is dangerous especially for those with limited mobility and the building would provide a poor standard of access for people with limited mobility.
- Concerns are raised about the veracity of the submitted ecological survey.
- The increase in height of the mews houses would reduce light levels to the houses along Beacon Place, and will affect the privacy of houses opposite.
- The proposed mews houses are inappropriate in scale and style in the Conservation Area.
- The access to the mews houses directly off Beacon Place could be dangerous for future residents and the proposed mews house garages do not meet minimum standards and would be unusable.
- Concerns are raised regarding the potential for increased noise levels as a result of the change in use of the site.
- The proposal would lead to disruption in a built-up residential area in the course of the conversion works.

PLANNING HISTORY

Reference	Description	Decision	Date
74/C1053	2 service flats with garage space under	Approval	04.03.1975
78/C0471	21 panel solar heating system to the hotel roof	Refusal	23.05.1978
79/C2033	New fire exit	Approval	14.02.1980
81/P1862	Erection Of Garage At Rear For Hotel Guests.	Approval	16.02.1982
85/P0488	Erection Of 2no Service Flats With Associated Garaging At Rear Of Hotel.	Approval	21.05.1985
86/P2153	Erection Of 2 Service Flats With Assoc Garaging (Amended Application.).	Approval	06.01.1987
86/P2196	Erection Of Two Service Flats And Garaging. (Amended Scheme).	Approval	06.01.1987
87/P0616	Conversion Of Storage Area Into Service Flat	Approval	16.06.1987
89/P0309	New Windows To Existing Lounge W.c. & Bathroom.	Approval	19.05.1989
97/P1233	Pitched Roof To Create Additional Flat	Refusal	10.10.1997
97/P1760	Provision Of Pitched Roof Forming Additional Flat: Amended Proposal	Refusal	14.01.1998
98/P1392	Internal Alterations & Formation Of Two Windows	Approval	21.09.1998
98/P1478	Two New Windows	Approval	06.10.1998

98/P1596	New Fire Escape Stair	Approval	28.10.1998
98/P1597	Internal Alterations & Construct Fire Exit Staircase	Approval	28.10.1998
98/P1834	Alterations	Approval	16.12.1998
98/P1835	Alterations To Form New Bedrooms Etc	Approval	16.12.1998
99/P0621	Alterations To Improve Fire Escape	Approval	17.05.1999
00/P0335	Mount Plaque Giving Brief Details Of The Property's Historic Connection	Approval	23.03.2000
03/P1347	Flying Of European Union Flag	Approval	30.06.2003
05/2452/TCA	Removal of five stumps.	Approval	10.10.2005
06/1457/FUL	Change of use of flats to hotel bedrooms including alterations to roof. Alterations to existing hotel building including the rear roof, provision of lift and additional dining space. New car park to rear of Louisa Place	Withdrawn	25.09.2006
06/1461/LBC	Change of use of flats to hotel bedrooms including alterations to roof. Alterations to existing hotel building including the rear roof, provision of lift and additional dining space. New car park to rear of Louisa Place	Withdrawn	25.09.2006

06/2965/FUL	Change of use and alterations to flats to provide additional hotel rooms including alterations to roof of hotel to provide additional 17 hotel bedrooms, erection of lift extension and additional car parking	Approval	13.12.2006
06/2973/CAC	Demolition of garages	Approval	07.02.2007
06/2977/LBC	Alterations and extensions to provide additional hotel bedrooms, lift and internal alterations to reception and restaurant areas	Approval	13.12.2006
07/2885/LBC	Replace double opening exit doors with aluminium glazed doors	Approval	19.12.2007
15/0078/LBC	Replastering of internal walls	Approval	04.03.2015
17/2037/LBC	Various works to lower ground floor basement to include: internal tanking; re-configure floor layout involving the removal of walls, construction of new walls, removal of piers, installation of new beams, creation of 3no. W.C. facilities and floor levels lowered	Approval	20.11.2017

POLICIES

Adopted East Devon Local Plan 2013-2031 Policies

Strategy 3 (Sustainable Development) Adopted

Strategy 5B (Sustainable Transport) Adopted

Strategy 6 (Development within Built-up Area Boundaries) Adopted

Strategy 22 (Development at Exmouth) Adopted

Strategy 32 (Resisting Loss of Employment, Retail and Community Sites and Buildings) Adopted

Strategy 34 (District Wide Affordable Housing Provision Targets) Adopted

Strategy 38 (Sustainable Design and Construction) Adopted

Strategy 43 (Open Space Standards) Adopted

Strategy 48 (Local Distinctiveness in the Built Environment) Adopted

Strategy 49 (The Historic Environment) Adopted
D1 (Design and Local Distinctiveness) Adopted
D2 (Landscape Requirements) Adopted
EN5 (Wildlife Habitats and Features) Adopted
EN6 (Nationally and Locally Important Archaeological Sites) Adopted
EN8 (Significance of Heritage Assets and their setting) Adopted
EN9 (Development Affecting a Designated Heritage Asset) Adopted
EN10 (Conservation Areas) Adopted
EN14 (Control of Pollution) Adopted
EN19 (Adequacy of Foul Sewers and Adequacy of Sewage Treatment System)
Adopted
EN21 (River and Coastal Flooding) Adopted
EN22 (Surface Run-Off Implications of New Development) Adopted
E17 (Principal Holiday Accommodation Areas) Adopted
E18 (Loss of Holiday Accommodation) Adopted
TC2 (Accessibility of New Development) Adopted
TC7 (Adequacy of Road Network and Site Access) Adopted
TC9 (Parking Provision in New Development) Adopted

Exmouth Neighbourhood Plan (Made April 2019)

Policy EN1: Proposals for development within the Built-up Area Boundary (BUAB) will generally be supported.

Policy EN5: The impact from any additional surface water resulting from development should be controlled and satisfactorily mitigated.

Policy EN6: Development proposals must incorporate Sustainable Urban Drainage Systems (SuDS) and a management plan for future maintenance of the drainage system.

Policy EB1: Development proposals should seek to conserve heritage assets

Policy EB2: New development should be mindful of surrounding building styles and ensure a high level of design.

Draft East Devon Local Plan 2020-2042 Policies

Strategic Policy SP01 (Spatial strategy) Draft
Strategic Policy SP05 (Development inside Settlement Boundaries) Draft
Strategic Policy SD01 (Exmouth and its development allocations) Draft
Strategic Policy CC02 (Moving toward Net-zero carbon development) Draft
Strategic Policy AR01 (Flooding) Draft
Strategic Policy AR02 (Water efficiency) Draft
Strategic Policy HN01 (Housing to address needs) Draft
Strategic Policy HN02 (Affordable housing) Draft
Policy HN04 (Accessible and adaptable Housing) Draft
Strategic Policy SE04 (Resisting the loss of employment sites) Draft
Strategic Policy DS01 (Design and local distinctiveness) Draft
Policy DS02 (Housing density and efficient use of land) Draft
Strategic Policy TR01 (Prioritising walking, wheeling, cycling, and public transport)
Draft
Strategic Policy OL01 (Landscape features) Draft
Policy OL09 (Control of pollution) Draft
Policy PB03 (Protection of irreplaceable habitats and important features) Draft
Strategic Policy PB04 (Habitats Regulations Assessment) Draft

Strategic Policy PB05 (Biodiversity Net Gain) Draft
Policy PB07 (Ecological enhancement and biodiversity in the built environment) Draft
Strategic Policy HE01 (Historic environment) Draft
Policy HE02 (Listed buildings) Draft
Policy HE03 (Conservation Areas) Draft
Policy HE04 (Archaeology and Scheduled Monuments) Draft

Government Planning Documents

National Planning Policy Framework 2024 (as amended)

ANALYSIS

Site Location and Description

The application site is the Royal Beacon Hotel which lies on the south eastern end of The Beacon, in an elevated position close to Exmouth's seafront.

The hotel forms part of a terrace of 23 properties built as high status houses for the wealthy middle and upper classes when Exmouth became a popular and fashionable seaside resort in the latter half of the 18th and 19th centuries. The houses are all of a similar style but contain a variety of individual features and detailing. Nearly all of the terrace is Grade II listed.

The Royal Beacon Hotel at No. 22 and 23 The Beacon, forms the end of the terrace. The building is of three storeys with a basement and an attic and is rendered with a slate roof.

No. 23 has bracketed eaves, with canted bay windows to the basement, ground and first floors arranged symmetrically around the front door with its classical style porch. No. 22 has canted bay windows to basement, ground, first and second floors and has a moulded cornice over the doorway supported on enriched consoles. No. 23 likely changed to a hotel in the mid-nineteenth century and was significantly extended to the rear. It is not known when No. 22 was incorporated into the hotel, but historic mapping suggests this may have occurred during the 1960s. Both buildings have later dormer windows at roof level.

The hotel also has a three storey rear element which addresses Lousia Terrace, and a more modern flat roofed rear two storey building to the rear of the block which faces Beacon Place.

The site falls within the Exmouth Conservation Area, and is within the Principal Holiday Accommodation Areas as defined by the Local Plan but no formal landscape designations apply to the site.

Statutory Listed Building Descriptions

Heritage Category: Listed Building

Grade: II

List Entry Number: 1097900

Date first listed: 06-Dec-1949

List Entry Name: No 23 (Royal Beacon Hotel) And Area Railings
Statutory Address: NO 23 (ROYAL BEACON HOTEL) AND AREA RAILINGS, 23,
THE BEACON

THE BEACON 1. 5176 (North-East Side) 6.12.49. No 23 (Royal Beacon Hotel) - and area railings SY 0080 1/21 II GV 2. Facade rendered white. Slate roof with wide bracketed eaves and bands between floors. 3 storeys and basement, 3 windows, the top floor outer windows 3 light sashes, 3 storey bay windows below with balustraded parapets, no glazing bars. Centre round arched door with keystone. Porch with iron balustraded parapet and steps. Area railings. Rear elevation retains slate hung bow and round arched staircase window. Included for group value.

Heritage Category: Listed Building
Grade: II

List Entry Number: 1164336

Date first listed: 06-Dec-1949

List Entry Name: No 22, Handrail and Area Railings

Statutory Address: NO 22, HANDRAIL AND AREA RAILINGS, 22, THE BEACON

THE BEACON 1. 5176 (North-East Side) 6.12.49. No 22, handrail and - area railings SY 0080 1/21 II GV 2. Late C19. Painted brick facade, slate roof. 3 storeys and basement. 2 windows, east side has full height bay terminating in hipped gable, all windows unbarred sashes, bands below those of bays. Round arched door with panelled pilasters, impost band and plain fanlight. Label above on enriched consoles with low relief mouldings. Area railings and iron balustrade to steps. Rear elevation retains slate hung bow and round arched staircase window. Included for group value.

Proposed Development

Approval is sought for the change of use of the hotel and the conversion of the building to form 19 apartments and 2 new build dwellings on the site.

The proposal would involve the demolition of some of the later rear elements including the modern two storey flat roofed section facing Beacon Place. The principal hotel building would be reconfigured to provide two apartments within the basement level, four apartments at ground floor level, six apartments at first floor level which includes one large apartment within the former ballroom, four apartments at second floor level and three apartments at third floor / roof level. Few changes are proposed to the exterior of The Beacon and the Louisa Terrace facing elevations, with the exception of the removal of an existing access porch from the south east elevation, and its replacement with open steps and railings to match those at the front of the building.

To the rear of the site two three storey mews houses are proposed, with garages to the ground floor, living spaces to the first floor and bedrooms within the roof space at second floor level. The central area of the mews houses is set back from the rear of the pavement to provide relief and a small amount of defensible space in front of the entrance doors to the two units. The proposed mews houses would be finished in a mixture of render and brickwork with vertically proportioned windows, slate roofs and lead clad dormer windows to the second floor.

Access to the rear of the site would be as per the current arrangement, via an undercroft off Louisa Terrace. The site to the rear is to be reconfigured to provide 19 car parking spaces and a small amount of soft landscaping. Access to the rear of the site is proposed as being controlled via an electrically operated gate.

The proposal would also allow for secure and undercover bin and bicycle storage within the ground floor of the scheme.

Analysis

The principal issues for consideration are:

- Principle of Development
- Design impact on character of site including heritage impacts
- Residential / Neighbour Amenity
- Highways, access and parking
- Ecology / biodiversity
- Biodiversity Net Gain
- Appropriate Assessment
- Affordable Housing
- Drainage and Flood Risk

Principle of Development

The application site is located within the Built up Area Boundary (BuAB) of Exmouth as defined by the adopted Local Plan, with the site having good access to services and facilities as well as public transport. Strategy 6 'Development within Built-Up Area Boundaries' of the Local Plan sets out criteria against which development within built up area boundaries can be assessed. There is support for growth and development within BuABs subject to an assessment of the impacts of any proposal.

The site lies within a Principal Holiday Accommodation Area as defined by Local Plan Policy E17. EDDC are keen to ensure the continued vitality and viability of the tourism industry in the resorts, and the loss of hotels providing holiday accommodation within the Principal Holiday areas of Exmouth and Sidmouth will be resisted. Policy E17 states:

Within the Principal Holiday Accommodation Areas, as identified on the Proposals Map, the change of use or redevelopment of hotels and other forms of holiday accommodation to non tourism accommodation uses will not be permitted unless:

- 1. there is no physical or economic potential for continued tourist use. And/or*
- 2. refurbishment or redevelopment for holiday accommodation purposes is not financially viable. And/or*
- 3. development proposals would result in environmental and/or economic benefits to the area that would outweigh the loss of the tourist accommodation.*

Permission for change of use will not be permitted unless it can be clearly demonstrated that there is no longer a need for such uses and that the building or

site has been marketed for at least 12 months (and up to two years depending on market conditions) at a realistic price without interest.

East Devon District Council's website gives detailed requirements for the Marketing Strategy Statement required for all applications proposing the loss of commercial or community facilities. In summary the following information is required:

- A copy of the letter of instruction to the agent
- The methodology used by the surveyor in arriving at a valuation
- Estate agents verifiable record of all enquiries
- A copy of the sales particulars and adverts

The marketing strategy statement should also include evidence of steps undertaken to diversify income and prevent the decline of the business.

The hotel has been marketed since January 2024, with the valuation having been arrived at by comparison with other hotels within the region. The business has been loss making for an extended period and therefore a traditional profits method approach, whereby a multiple is applied to the trading profits of the business, was not appropriate to underwrite a value.

The applicant has provided a copy of the letter of instruction to the agent, and a copy of the sales particulars and adverts. The initial asking price was reduced in June 2024, and reduced again in September 2024 by a factor of 20% below the original valuation. The details were viewed 1,923 times on the agent's website, which led to 23 enquiries (up until mid February 2026), but to date no offers have been received.

The submitted application also considered the potential to convert the hotel into hotel apartments in order to retain a tourism use on the site. Two options were considered; either retaining the apartments as an apart-hotel business, or selling the units to investors.

Both of the apart-hotel schemes would generate a lower value per square foot in comparison with a residential conversion. Servicing costs for the apartments, such as sales and marketing expenses, maintenance expenses, utility costs, insurance and business rates, mean this is a more costly option than a traditional residential conversion.

Apart-hotel returns are seasonal, and combined with the additional costs, reduces the capital value in comparison with ordinary residential sales. The proposed conversion of the building to an apart-hotel scheme to retain a tourism use at the site would result in a large negative land value and would therefore not be viable. Selling the units to investors would result in a smaller negative value but this would still not be enough to offset the conversion costs.

EDDC commissioned an independent review of the viability information submitted with the application. The report agreed with the conclusions of the submitted report, that the hotel is not financially viable in its current use and would only become viable with very substantial investment and increased income. The hotel has been loss-making for most of the past 7-8 years and was only profitable during the post Covid

years owing to government financial support during the pandemic and unprecedented demand for hotels within the UK due to travel restrictions.

The report highlights significant pressures from wage increases, including National Insurance changes, energy and utility costs and inflation in supplies and services which have further eroded already weak margins. The building is in a poor condition and would require significant investment to maintain the viability of the hotel but there is no financial return to justify the investment. The report highlights that the current owner is a competent and experienced hotel operator and even with economies of scale and professional management has not been able to make the hotel profitable. The report agrees with the applicant's conclusion that the existing hotel use is not viable and would not support the level of investment required to refurbish the building.

EDDC's Economic Development team has reviewed both the viability report submitted by the applicant and the independent report commissioned by the Council. Given that the property has been actively marketed for an extended period, during which no credible interest has emerged that would be capable of delivering the level of investment required, the Economic Development team raise no objection to the proposed scheme.

A further material consideration is East Devon's housing land supply position which currently stands at 3.5 years, which engages the presumption in favour of sustainable development, as at NPPF Para 11d, whereby permission for development proposals should be granted unless the application of policies within the NPPF that protect areas or assets of particular importance provide a strong reason for refusing the development proposed; or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, and securing well-designed places.

Assets of particular importance as referred to within Footnote 7 of Paragraph 11d include designated heritage assets.

As such given that the criteria of Policy E17 have been met, the principle of the redevelopment of the hotel to a residential use is considered acceptable, subject to an assessment of other impacts of the proposal.

Design impact on character of site including heritage impacts

Local planning authorities have a statutory requirement to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' (section 16 and 66). Applicants for consent that affects a heritage asset must be able to justify their proposals.

The NPPF says that the LPA should require an applicant to describe the significance of any heritage asset affected including any contribution made to their setting. This should be sufficient to understand the potential impact of the proposal on its significance. As a minimum the Heritage Environment Record should have been

consulted and the building assessed using appropriate expertise where necessary. When considering the impact of development, great weight should be given to the asset's conservation. Any harm or loss should require clear and convincing justification from the applicant. Any harm should be judged against the public benefit, including securing the optimum viable use.

The Royal Beacon Hotel, made up of Nos. 22 and 23 The Beacon, stands in a highly visible location within one of Exmouth's earliest and most notable terraces dating from the 18th and 19th centuries. Exmouth's Conservation Area Appraisal notes the fine examples of well preserved and maintained terraced period houses along The Beacon, with associated detail of high quality. The Beacon is referred to in Pevsner as 'a sea view terrace, the earliest houses built from 1792 onwards. Not a unified group just a pleasant mixture of red brick and stucco, late Georgian pedimented doorcases, porches with sturdy Ionic columns'. The Royal Beacon Hotel retains much of its original detailing to the front elevation, such as the bracketed eaves, banding between floors, the rounded arched door with keystone, front porch and the railings along the front of the property. Historic photographs show No. 22 originally had brickwork elevations but is now also rendered. No. 22 contains the same render banding across the front elevation, and railings to the street. The windows across the front elevations of both buildings are one over one timber sash windows.

Tithe apportionment records show No. 22 and 23 were still private houses in 1845. The building was likely converted to a hotel in 1852. The 1889 Ordnance Survey map shows a significant rear extension to the building, and to the rear stables /coach house. The extension to the rear facing Louisa Terrace is a substantial late C19 three-storey pitched roofed extension which incorporates the ballroom. To the rear of the site facing Beacon Place is a two storey flat roofed structure containing further hotel bedrooms that dates from the mid 1980s. Other post 1950s additions have been added to the courtyard side of the three storey extension, incorporating additional stairs, circulation spaces and bin stores. The statutory list description refers to slate hung bow and round arched staircase windows to the rear of the building. The bow window is still in situ (but no longer slate hung) but the staircase window has been subsumed by later additions to the rear of the hotel to provide en-suite bathrooms to the hotel rooms.

The front façade of the hotel has architectural significance through its elegant frontage and the contribution this makes to the architectural and historic character of The Beacon. The rendered façade, well-proportioned sash windows, and restrained classical detailing reflect the refined architectural character of late Georgian seaside development. Subsequent 19th-century alterations, such as the addition of bay windows, show efforts to adapt the building in line with evolving fashions. To the rear, the significance has been somewhat eroded by numerous phases of alterations and extensions of a rather utilitarian nature.

The building's historic significance also derives from the building's development as a high status private residence to its conversion to a hotel in the mid-19th century, and its associative value with Exmouth's evolution as a fashionable seaside resort. The building contains evidential value in the form of historic fabric and early plan form. Having operated on the site for over 170 years, The Royal Beacon Hotel also has

moderate communal value as one of Exmouth's most prominent and long-standing hotels.

The Beacon itself is one of Exmouth's most impressive and cohesive architectural groupings, designed to capitalise on sea views and the scenic outlook over the Exe Estuary. The hotel's principal elevation forms an integral part of this planned composition and enhances the broader townscape character and that of the Exmouth Conservation Area.

No changes are proposed to the principal elevation, other than repair of the built fabric and removal of hotel signage. Repairs to the facades are outlined within the Heritage Scope of Works, although no detailed condition survey has been provided with the application. A number of elements are proposed for demolition to the rear courtyard, to reveal the earlier plan form, create a more legible footprint to allow the conversion and to create additional external space to maximise parking.

The revised access to the basement facing towards Louisa Terrace would remove a modern addition of no significance, and is therefore supported. A three storey flat roofed later extension to the rear of the main hotel building is also proposed for removal, which will reveal the original rear elevation.

A three-storey pitched roof projection is attached to the side of the ballroom extension and may be contemporary with it, the north elevation of which contains historic windows. This is also proposed for demolition.

While this is not the earliest part of the building, it forms part of the building's evolution during its expansion as a hotel and therefore makes some contribution to the building's historic interest. The submitted Heritage Statement asserts that removing this protruding section will improve the outlook for most of the rooms along the rear elevation and allow more of the original rear elevation to be visible from the courtyard. The removal of this small section would lead to less than substantial harm, which would have to be weighed against the public benefits of providing a viable use for the building as a whole.

New windows on the newly revealed external walls would match the historic pattern of fenestration and a condition would be imposed regarding joinery details of the proposed new windows.

Within the oldest part of the hotel facing The Beacon, no original features such as doors, skirtings or cornices have been retained, other than the original windows to many of the rooms. Partition walls to en-suite bathrooms are also modern. The communal areas to the ground floor contain some later C19th details such as the cornices in reception and a fireplace to the right hand bar area.

The basement has been much altered in the past and contains few surviving features. This would be subdivided to form two apartments, retaining much of the original layout with additional partition walls added. There is a significant crack to one of the basement chimney breasts which requires investigation and repair, which would be addressed via condition. The design and access statement also refers to remedial treatment being required to address damp within the basement, and as

such further information would be required by way of condition in respect of this element of the works as well.

Few changes are proposed to the earliest part of the ground floor layout in the course of the conversion of this part of the building to form two apartments facing The Beacon. The layout to the rear of the ground floor has already been much altered. Amendments have been made to the layout in light of the conservation officer's comments that more of the surviving historic internal walls could be retained within the scheme.

The first floor ballroom contains original detailing such as dentilled cornices and panelled window surrounds. The scheme as originally submitted proposed the subdivision of the ballroom into two apartments, with the double entrance doors to the ballroom shown as being blocked up. In response to concerns regarding the loss of this historic and impressive space, the current proposal shows the ballroom being retained as one apartment, with access via the ballroom entrance doors. The living area is proposed as a double height space to allow the historic volume to retain its legibility. Bedrooms have been placed upon a mezzanine level.

At second and third floor level, minor alterations are proposed to the current internal layout in the reconfiguration of floor plan from hotel rooms to apartments.

In terms of the design and outward appearance of the building the most significant change is the proposed demolition and replacement of the current accommodation block facing Beacon Place. The proposed 1980s rear accommodation block is stark and utilitarian, and the replacement of this building provides an opportunity for a replacement building to make a positive contribution to local character and distinctiveness. Historic aerial photographs of the site show that the site was occupied at an earlier date by a pitched roof building of a significant height, orientated parallel to Lousia Terrace.

The proposed replacement building is on a similar footprint but with a small set back mid way along the Beacon Place elevation to allow defensible space in front of the entrance doors to the proposed mews houses. This would also allow for a small pocket of soft landscaping in this area to enhance the street scene. The eaves height is similar to that of the existing building, but a pitch roof with dormers is proposed in lieu of the existing flat roof. Along the majority of the Beacon Place elevation this is set back from the façade to reduce the impact of the additional height, effectively appearing as an additional 'half storey'. The building is curved on plan at the junction of Lousia Terrace and Beacon Place, with an inset balcony designed to look east along Rolle Villas road. This is discussed in more detail under residential amenity.

A contemporary aesthetic is proposed for the mews houses, with vertically proportioned windows and dormers reflecting the overriding proportions seen along the rear of The Beacon. The roof indicates crisply detailed leadwork dormers and a slate roof, again reflecting the local characteristics. The elevations indicate a mixture of white render and brickwork panels, reflecting the mixture of materials to the rear elevations of The Beacon. The proposed elevations would provide a higher level of articulation and interest than the current modern extension and would enhance the character of the conservation area. A condition would be imposed requiring further

information regarding the proposed materials and construction detailing to ensure the quality and finish of the building.

The proposal would retain a flat roofed link between the ballroom and the mews building. The position of the existing underpass off Lousia Terrace to the rear courtyard would be retained, but this would be closed off with a door / gate. Details of the door would be required by way of condition.

The existing courtyard space to the rear of the building is a relatively small, tarmacked courtyard providing parking. Following removal of many of the later rear extensions and external fire escape stairs, a larger rear courtyard would be created. The proposed plans show a small area of soft landscaping to the immediate rear of the building. Details of the proposed surfacing materials, planting and boundary treatments would be required by way of condition.

The proposal would require making good to a number of the elevations following removal of later extensions. A condition is proposed requiring a condition survey of the building, to include details of roof and rainwater good repairs, overhaul and repair or replacement of windows and doors and external masonry repairs where necessary.

Further detail would also be required by condition in respect of internal doors, including ironmongery and details of architraves. Information would be required regarding new timber joinery (skirtings / cornicing / picture rails etc) throughout the building, as well as acoustic and thermal upgrades to existing partition walls required in the course of the change of use of the building. It is not proposed to line the external walls. New services within the building would be expected to make use of existing hotel risers wherever possible. Further details would also be required in respect of replacement rainwater good, soil pipes, extract vent locations and details and utility metres.

The proposed changes to the internal layout of the hotel are seen as a relatively minor intervention given the already much altered layouts. The replacement of the current 1980s rear block is seen as an enhancement to the site, and the revised ballroom layout allows the volume of this space to be appreciated, retaining its historic and architectural significance. The most significant change is the removal of the mid C19th extension to the north of the ballroom, which would lead to some harm through the loss of historic fabric, although this harm is offset by the demolition revealing the historic bow window to the rear.

The NPPF requires that great weight be given to an asset's conservation. Given that the use of the building as a hotel has been shown not to be viable, the conversion of the building to residential accommodation would put the building into a viable use. In terms of the significance of the building, the frontage facing The Beacon is of the highest architectural significance, which would be enhanced through repairs as a result of the change of use. The ballroom is of medium significance, and the proposal would retain this through the sensitive conversion. The replacement building to the rear is seen as an enhancement to both the building and the conservation area.

Overall while the loss of one of the rear extensions is regrettable, overall the scheme would allow for the removal of a number of later utilitarian extensions which detract from the building. The proposal would allow for the repair and rehabilitation of the heritage asset, which would sustain and enhance its significance, and put the building into a viable use consistent with its conservation. The proposal would provide much needed housing, and would contribute to the economic vitality of the area through the works themselves and through social and economic contributions of future residents.

In terms of the impacts of the proposal on other listed buildings, the proposed repair of the building would enhance the overall terrace along The Beacon. Grade II listed No. 1 Louisa Terrace sits immediately to the south east of the site. The extent of built form facing the site would be relatively unchanged, with the exception of the additional roof height to the corner of the mews block. The proposed slate pitched roof would provide a more appropriate design response within the conservation area and would enhance the setting of this building.

The Devon Historic Environment Team has commented that as the proposal involves the conversion of a listed (and therefore nationally important) heritage building from hotel to residential use, plus the construction of two new dwellings, the works could affect both the historic building fabric and potential archaeological deposits associated with the late 18th and early 19th century expansion of Exmouth into this area.

To mitigate the impact upon the heritage asset, it is recommended that a Written Scheme of Investigation (WSI) is submitted setting out the scope of work for both Historic building recording before and during works, as well as an Archaeological investigation and recording of any remains affected. A WSI has not been submitted with the application therefore a condition would be imposed upon any approval requiring the submission of a WSI prior to the commencement of any works on site. A further condition would be imposed requiring the submission of a post investigation assessment prior to the occupation of the development.

With the appropriate conditions in place, the proposal would be in accordance with Local Plan Policies EN6, EN9 and EN10, Exmouth Neighbourhood Plan Policies EB1 and EB2, and NPPF Paragraphs 210, 215 and 219.

Residential / Neighbour Amenity

The scheme proposes the conversion of the existing hotel into 19 apartments, which comprise a mixture of 5 no. one bed apartments, 10 no. two bed apartments and 4 no. three bed apartments.

All of the apartments are above the minimum area required by the Nationally Described space standard, with the exception of 1 no. one bed apartment to the second floor which has a floor area of 48.6 square metres, against a minimum requirement of 50 square metres. Given that the EDDC Local Plan does not specifically request adherence to the Nationally Described minimum space standards and the proposal involves the reconfiguration of an existing listed building

which means relocating walls to fully comply could cause harm to the building, the small departure from the standard is considered acceptable.

The two mews houses are also above the minimum area required, excluding the areas of the garages to the ground floor.

Five of the double bedrooms across the development are slightly smaller than that required by the Nationally Described minimum space standard of 11.5 square metres (Lower Ground apartment 1 Bed 2 is 10.7sqm, Lower Ground Apartment 2 Bed 2 is 9.6sqm, Ground Floor Apartment 4 Bed 2 is 10.0sqm, Third Floor Unit 3 Bed 2 is 9.7 square metres and Mews House 2 Bed 3 is 10.8 square metres). With the exception of the mews houses the apartments have been planned around the existing layouts of the listed building therefore some again a slight deviation from the standard is considered acceptable. All of the rooms in question would be above the minimum area for a single bedroom at 7.5 square metres and all of the units have double bedrooms that comply with the minimum area of 11.5 square metres therefore the plans are considered acceptable.

The apartments are predominately arranged with open plan living areas facing outwards towards The Beacon, Louisa Terrace and Beacon Place. There are two apartments within the basement, but as the ground floor is raised above the pavement level these apartments are served by large bay windows to the south west elevation, albeit the lower portions of the windows would be below pavement level.

Concerns were raised by officers and by third parties regarding the potential for overlooking and loss of privacy for the houses opposite Beacon Place owing to the large extent of glazing originally proposed to the mews houses, particularly at first floor level. The scheme as submitted also had two large balconies facing the existing houses along Beacon Place which also gave rise to concerns regarding lack of privacy for existing residents. Revised proposals have been submitted which have significantly reduced the amount of glazing facing the existing dwellings along Beacon Place. The amount of glazing proposed at first floor level opposite the houses on Beacon Place is now less than the current amount of glazing within the existing building. One of the balconies has been relocated to the corner of the site which would look along Louisa Place rather than towards the existing houses. The second balcony has been relocated to the rear elevation of the Mews Houses and would overlook the courtyard instead. The balcony is set behind the rear walls of the mews houses to limit overlooking over neighbouring gardens. There are already hotel windows in this location therefore any overlooking would be similar to the current arrangement. A further small terrace has been created on the south east elevation, set behind the external elevations to minimise overlooking. The relationship to the surrounding development would be similar to other larger windows along the same elevation.

The proposed mews houses are of a similar eaves height to the existing hotel building facing Beacon Place to the rear of the site, but with a pitched roof as opposed to the current flat roof. There are other buildings further along Beacon Place to the rear of Beacon Terrace that are two storey with a pitched roof. The central section of the elevation has been stepped back to allow for defensible space in front of the front doors to both of the mews houses, and the pitched roof itself is

set back behind a parapet to reduce its physical impact. It is not considered that the small increase in height would result in a reduction in the level of daylight or sunlight to nearby dwellings.

The main hotel entrance is presently accessed via a set of steps directly from the road edge. There are no plans to change this entrance, but in terms of the provision of a more inclusive access, this has been considered at the rear entrance to the building. Level access is provided to the rear lift, providing access to first floor apartments 4 and 5. A wheelchair platform stair lift is provided at the principal rear entrance, giving access up to the main ground floor level, and to a second lift serving the apartments to the front of the building. Three apartments would have stepped entrances. Given the constraints of the existing building and the very limited space for circulation at the front of the building this is considered to provide an acceptable and reasonable standard of access to the proposed dwellings.

Devon and Cornwall Police raised concerns regarding the proposed open entrance to car park, and the potential risk for casual intrusion, especially given the lack of surveillance, and in comparison with the current semi-public nature of the rear hotel courtyard. The police highlighted the site's location close to the town centre where levels of crime and anti social behaviour are higher in comparison with other neighbourhoods nearby.

In response to the comments, the proposal would incorporate an automated security roller shutter at the vehicular entrance to the site. The police have also asked that consideration be given to the provision of CCTV to external areas and internal communal areas, but it is not considered that this would be reasonable or necessary. External lighting would be required to all external doors to lighting levels within the rear courtyard should meet the levels required by BS 5489-1:2020. Further information in this regard would be required by condition.

The police have also requested that consideration be given to the locking mechanism of any external doors, including the bin and bike store. The police have also expressed a preference for communal letter boxes and utility metres to be located externally on a street facing elevation, however given the architectural significance of the building it is not considered this would be appropriate.

Environmental Health have requested that a Construction and Environment Management Plan (CEMP) be submitted, covering both the demolition and construction phases, in respect of air quality, dust, water quality, lighting, noise and vibration, pollution prevention and control, and monitoring arrangements, to protect the residential amenity of existing and future residents near the site.

In terms of heating for the apartments and housing, the buildings are proposed as being heated by air source heat pumps located on the flat roofed area over the vehicular site entrance. It has also been recommended by Environmental Health that any plant proposed must be design as part of an overall sound mitigation scheme to operate at a level of 5dB below the site's daytime background sound level. Further details would also be required by condition in respect of the proposed plant equipment, and details of the proposed plant area screening to ensure that the visual impact of any plant is minimised.

The mews houses each have their own dedicated, secure bin store adjacent to their front doors. Bin storage for the apartments is provided at ground floor level within a secure store adjacent to the underpass. A condition would be imposed upon any approval requiring the bin store to be provided prior to the occupation of the development to ensure a satisfactory standard of residential amenity to future occupiers.

With the appropriate conditions in place the proposal would be acceptable and in line with Local Plan Policy D1 and EN14.

Highways, access and parking

Devon County Highways have confirmed that taking into account the current hotel use, the change of use to residential accommodation would not lead to trip intensification in comparison with the current hotel use of the site.

Local Plan Policy TC9 'Parking Provision in New Development' states:

Spaces will need to be provided for Parking of cars and bicycles in new developments. As a guide at least 1 car parking space should be provided for one bedroom homes and 2 car parking spaces per home with two or more bedrooms. At least 1 bicycle parking space should be provided per home. In town centres where there is access to public car parks and/or on-street parking lower levels of parking and in exceptional cases where there are also very good public transport links, car parking spaces may not be deemed necessary. All small scale and large scale major developments should include charging points for electric cars.

The scheme proposes 19 car parking spaces within the courtyard of the hotel, and the mews houses both have a garage which would provide one car parking space and a cycle parking space for each dwelling. The mews house garages are sized to allow for car and bike parking. Therefore, the overall provision is less than that required by Policy TC9 given that only five of the apartments are one bedroom apartments. Presently the 52 bedroom hotel has just 6 parking spaces within the courtyard, therefore guests either arrive by public transport or park within the surrounding streets or public car parks. In comparison with the existing use of the site, the proposal would represent a significant improvement in the provision of off street parking. The site is well served by public transport therefore a lower level of parking of one space per dwelling is considered acceptable. The National Planning Policy Framework states that development should only be 'prevented or refused on highways grounds if there would be an unacceptable impact on highway safety' (paragraph 116). Given that the scheme would provide a significant increase in the number of spaces available, despite the number of third party objections received in this respect it is not considered that a refusal on the basis of highways impacts could be substantiated, especially given DCC Highway's support.

DCC Highways raised concerns regarding the lack of information regarding visibility splays from the proposed garages onto Beacon Place, which are in relatively close proximity to the junction with Lousia Terrace. The applicant has subsequently provided a Transport Statement Addendum showing visibility splays of 2 metres x

3.5 metres from the garage entrances, and junction visibility to the north from the Beacon Place / Louisa Terrace junction, demonstrating that drivers egressing the garages have sufficient visibility to see potential hazards on Beacon Place. On this basis DCC Highways have confirmed they no longer object to the proposal.

24 bicycle parking spaces are provided in a lockable store accessed from the courtyard. A further two Sheffield cycle stands are provided near the entrance to the store for visitors. This is in excess of the requirement of one space per dwelling referred to in Policy TC9 above.

Each dwelling with allocated parking will be provided with a 7kw fast charging point in line with Part S of the Building Regulations, which is also in excess of the requirements under LP Policy TC9.

Further conditions would be imposed requiring that the bicycle and car parking spaces are laid out prior to the occupation of the development to ensure adequate provision is in place for cars and bikes associated with the development.

With the appropriate condition in place the proposal would comply with TC7 and TC9 of the Local Plan.

Ecology / biodiversity

The application is supported by a Biodiversity Assessment Report which include the results of a site walkover and a preliminary roost assessment undertaken by a licensed bat ecologist. The buildings are assessed as having a low suitability for roosting bats, and are unlikely to support roosting bats. Large areas of the roof space have been converted into accommodation therefore only a few roof voids are retained, which are accessible via hatches. The basement contains a number of windows which admit light and thereby means the presence of roosting bats in the basement is unlikely.

Nevertheless, the report acknowledges that the proposed development has the potential to impact nesting birds and the report makes recommendations regarding the timing of the demolitions to reduce impacts to nesting birds.

A number of biodiversity enhancements are proposed, including the provision of bee bricks, two surface mounted and one integrated bat box, three surface mounted swift boxes, either on the existing building or integrated into the fabric of the new buildings.

The recommendations of the ecology report shall be conditioned as part of any approval, and in particular the enhancements detailed in section 3.1 of the report, to ensure that the works are carried out in accordance with the requirements of the report. With the required conditions in place the proposal would be in compliance with Local Plan Policy EN5.

Biodiversity Net Gain

The proposal is not subject to the mandatory Biodiversity Net Gain requirements. The existing site comprises buildings and hardstanding to the rear courtyard, all of which would be assigned a zero score under the biodiversity gain metric. As such it would not be possible for the application to achieve a 10% increase in biodiversity at the site.

Appropriate Assessment

The Conservation of Habitats and Species Regulations 2017, places a legal duty on local planning authorities to protect internationally important wildlife sites. The LPA must not grant planning permission for any development that would, either alone or in combination with other plans or projects, have a likely significant effect on a European wildlife site unless the impact can be fully mitigated.

The existing use of the site as a hotel already creates pressure on the Exe Estuary and Pebblebed Heaths SPAs. The LPA has undertaken an Appropriate Assessment in respect of the proposed change of use of the site.

Additional residential accommodation within 10km of the Pebblebed Heaths and Exe Estuary SPA/SAC will increase recreation impacts on the interest features.

The existing hotel contains 52 bedrooms and therefore can accommodate 104 people. Based on an average occupancy of 64%, the existing hotel would be occupied by an average of 67 people.

The proposed residential scheme includes 19 apartments and two mews houses, with a maximum occupancy of 77. Data from the Office for National Statistics on occupancy ratings, taken from the 2021 census, states that within the South West households are typically underoccupied (in terms of the number of unoccupied bedrooms) by 73.6%. This means on average 73.6% of properties have at least one spare bedroom. This would reduce the average occupancy of the scheme from a maximum occupancy of 77 people across 44 bedrooms to an average of 49 people across 26 bedrooms.

Therefore, based on average occupancy figures the hotel would on average be occupied by 67 people whereas the residential scheme would be occupied by 49 people.

As such the development would result in a reduction in impacts to the SPA's and therefore the standard mitigation contribution would not be required.

Affordable Housing

Local Plan Strategy 34 (District Wide Affordable Housing Provision Targets) requires that above a threshold of 10 dwellings, a percentage of dwellings are affordable. Within Exmouth Strategy 34 requires that 25% of dwellings are affordable. On the basis of the proposal being for 21 no. dwellings this equates to a requirement of 5.25 affordable units.

It is considered that taking on five units within a listed building would not be an attractive prospect for a Registered Provider (RP), and it would be unlikely that these units would be taken on. As such a commuted sum of £ 242,739 is therefore proposed in lieu of on-site provision, which would be secured by a Section 106 Obligation.

Drainage and Flood risk

Rainwater from the roof and car park of the hotel are currently disposed of via the 750mm diameter combined public sewer within Louisa Terrace.

Both SWW and DCC Flood Risk Management Team initially raised objections to the proposal on the grounds that the scheme should provide a betterment in terms of discharge of surface water from the site into the combined sewer.

The submitted Drainage Strategy outlines that the proposed redevelopment of the site would allow attenuation and SuDS features to be introduced to reduce the rate at which flows enter the combined sewer network, through the use of small garden area, an attenuation tank and potentially a permeable material within the car park area to the rear of the site. On the basis of this information DCC's objection to the scheme has subsequently been removed.

The detailed drainage design would be required via a pre-commencement condition, which would include a survey of the existing surface water drainage system, including gutters and rainwater downpipe, to ensure that it is within a suitable condition. The detailed drainage design should ensure that the system is suitably sized to allow for climate change allowances. The onsite drainage and SuDS devices will remain private and be the maintenance responsibility of a private management company as appointed by the developer.

SWW have confirmed they are able to supply clean potable water services to the site, and are also able to provide foul sewerage services from the existing public foul main within the vicinity of the site.

SWW have also encouraged maximising the use of water efficiency opportunities within the design of the proposal. The current average water use in the UK is approx. 142 litres/person/day [l/p/d] (Water UK, 2020), with the South West experiencing a higher-than-average consumption rate than the rest of England. With climate change progressing with trends set to add further stress upon available water resources, SWW have stated they would support the LPA imposing a condition requiring the optional Building Regulations requirement (G2) of 110 l/p/d for the proposed residential development. Such a condition has therefore been added should the application be recommended for approval.

With the appropriate conditions in place, the proposal would comply with Local Plan Policy EN19 and EN22.

Health contributions

The NHS Devon Integrated Care Board have stated that the GP surgeries within the catchment area of the scheme currently have sufficient infrastructure capacity to absorb the population increase that this potential development would generate.

Royal Devon University Healthcare NHS Foundation Trust has commented that they are currently operating at full capacity in the provision of acute, community and planned healthcare. The proposed development will create a potentially long-term impact on the Trust's ability to provide its services in a safe, accessible and sustainable manner to current and new residents. A contribution of £ 5,361 is sought to go towards the gap in the funding created by each potential patient from this development.

Infrastructure provision in EDDC is however provided for via CIL payments, so it is not possible to include this financial contribution as a S.106 obligation.

Other matters

No trees would be affected in the course of the development. Devon County Council Waste Planning Authority (WPA) have recommended the imposition of a pre-commencement condition requiring the submission of a waste audit statement prior to the commencement of development to minimise the amount of waste associated with the development.

Planning Balance

The application has demonstrated through evidence of marketing and viability evidence that the existing hotel use is no longer economically viable, therefore the principle of the change of use from hotel to residential accommodation is considered to be justified and would comply with Local Plan Policy E17 Principal Holiday Accommodation Areas.

The scheme has been designed to respect the significance of the building, with key elements of architectural significance such as the principal elevation being retained and enhanced. The new build element to the rear is considered to represent an enhancement to the character and appearance of the site and the wider conservation area. The proposal would allow for the repair and rehabilitation of the heritage asset and put the building into a viable use consistent with its conservation. Overall, the proposal would secure the long-term future of a prominent heritage asset, enhance the character of the conservation area, and deliver much needed housing. Subject to the imposition of appropriate planning conditions and affordable housing obligations, the development is considered to comply with policies contained within the East Devon Local Plan and the Exmouth Neighbourhood Plan, and approval is therefore recommended.

RECOMMENDATION

APPROVE subject to a Section 106 Obligation to secure off-site contribution towards affordable housing and the following conditions on 25/2397/MFUL:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission and shall be carried out as approved. (Reason - To comply with section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).
2. The development hereby permitted shall be carried out in accordance with the approved plans listed at the end of this decision notice. (Reason - For the avoidance of doubt.)
3. Prior to the commencement of development, a waste audit statement shall be submitted to, and approved in writing by the Local Planning Authority. This statement shall include all information outlined in the waste audit template provided in Devon County Council's Waste Management and Infrastructure Supplementary Planning Document. The following points shall be addressed in the statement:

-Identify measures taken to avoid all waste occurring.

-Demonstrate the provisions made for the management of any waste generated to be in accordance with the waste hierarchy.

-The amount of construction, demolition and excavation waste in tonnes, set out by the type of material.

-Identify targets for the re-use, recycling and recovery for each waste type from during construction, demolition and excavation, along with the methodology for auditing this waste including a monitoring scheme and corrective measures if failure to meet targets occurs.

-The details of the waste disposal methods likely to be used, including the name and location of the waste disposal site, and justification as to why this waste cannot be managed more sustainably.

The development shall be carried out in accordance with the approved statement.

(Reason: A pre-commencement condition is required to ensure that all waste material is dealt with in a sustainable way from the outset of the development including any groundworks, demolition, construction and operation, to minimise the amount of waste produced and promote sustainable methods of waste management in accordance with Policy W4 of the Devon Waste Plan and the Waste Management and Infrastructure Supplementary Planning Document).

4. Prior to the commencement of development, the developer shall have secured the implementation of a programme of (i) historic building recording and (ii)

archaeological work in accordance with a written scheme of investigation (WSI) which has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out at all times in accordance with the approved scheme as agreed in writing by the Local Planning Authority.

(Reason -A pre-commencement condition is required to ensure that that an appropriate record is made of the historic building fabric prior to the commencement of preparatory and/or construction works, in accordance with Policy EN6 (Nationally and Locally Important Archaeological Sites) of the East Devon Local Plan and paragraph 218 of the National Planning Policy Framework (2024).

5. The development shall not be occupied until the post investigation assessment has been completed in accordance with the approved Written Scheme of Investigation. The provision made for analysis, publication and dissemination of results, and archive deposition, shall be confirmed in writing to, and approved by, the Local Planning Authority.

(Reason: To comply with Paragraph 218 of the National Planning Policy Framework (2024), which requires the developer to record and advance understanding of the significance of heritage assets, and to ensure that the information gathered becomes publicly accessible.)

6. Prior to the commencement of development including demolition, a Construction and Environment Management Plan (CEMP) covering both the demolition and construction phases must be submitted and approved by the Local Planning Authority and shall be implemented and remain in place throughout the development. The CEMP shall include at least the following matters: Air Quality, Dust, Water Quality, Lighting, Noise and Vibration, Pollution Prevention and Control, and Monitoring Arrangements. Any equipment, plant, process or procedure provided or undertaken in pursuance of this development shall be operated and retained in compliance with the approved CEMP. Construction working hours shall be 8am to 6pm Monday to Friday and 8am to 1pm on Saturdays, with no working on Sundays or Bank Holidays. There shall be no burning on site and no high frequency audible reversing alarms used on the site.

(Reason: A pre-commencement condition is required to ensure that the details are agreed before the start of works to protect the amenities of existing and future residents in the vicinity of the site from noise, air, water and light pollution, in accordance with Policy D1 - Design and Local Distinctiveness and EN14 - Control of Pollution of the adopted East Devon Local Plan 2013-2031).

7. Prior to the commencement of development, the following information shall have been submitted to and approved in writing by the Local Planning Authority:
 - (a) A detailed drainage design based upon the Flood Risk Assessment and Drainage Strategy (Job No. 10946, Rev. 3, dated May 2026).
 - (b) Detailed proposals for the management of surface water and silt runoff from the site during construction of the development hereby permitted.

(c) Proposals for the adoption and maintenance of the permanent surface water drainage system.

(d) A plan indicating how exceedance flows will be safely managed at the site.

(e) A detailed assessment of the condition and capacity of any existing surface water drainage system/watercourse/culvert that will be affected by the proposals. The assessment should identify and commit to, any repair and/or improvement works to secure the proper function of the surface water drainage receptor.

No building hereby permitted shall be occupied until the works have been approved and implemented in accordance with the details under (a) - (e) above.

(Reason: A pre-commencement condition is required to demonstrate that the proposed surface water drainage system is shown to be feasible before works begin, and to ensure the proposed surface water drainage system will operate effectively and will not cause an increase in flood risk either on the site, adjacent land or downstream in line with SuDS for Devon Guidance (2017) and national policies, including NPPF and PPG) .

8. Prior to the commencement of development, details of a water efficiency scheme shall have been submitted to and approved in writing by the Local Planning Authority. The scheme shall demonstrate that the development has been designed to achieve a maximum water consumption of no more than 110 litres per person per day.

The development shall be carried out in accordance with the approved details and shall be retained as such thereafter.

(Reason: A pre-commencement condition is required to ensure that the scheme is feasible before works begin to avoid redesign / unnecessary delays during construction, to ensure the efficient use of water resources and to accord with sustainable development objectives in accordance with Strategy 3 - Sustainable Development of the adopted East Devon Local Plan 2013-2031.)

9. Prior to the commencement of the specific work items listed below, the following details and specification in respect of the Mews Houses shall be submitted to and approved in writing by the Local Planning Authority:

- Locations of extract vent terminals including material, colour and finish
- Flue terminals including location and appearance (if applicable)
- Utility meter box details and locations
- Rainwater goods and soil pipes including profiles, materials and finishes
- Sections through new lead dormers at 1:20
- Natural slate to mews houses, including details of ridge and hip tiles and fixing details
- Sections / elevations of balcony balustrades to mews houses at 1:20
- Details of brickwork to mews houses and section details of interface between brickwork and render at 1:5
- Details of parapet capping to mews houses including sections through capping at 1:10
- Details of external windows and doors to mews houses including sections and elevations at 1:20

- Details of garage doors to mews houses including material, colour and finish

The works shall be carried out in accordance with the approved details and specification.

(Reason - In the interests of the architectural and historic character of the heritage asset, and the character and appearance on the Conservation Area and the visual in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset, Policy EN10 - Conservation Areas and D1- Policy D1 - Design and Local Distinctiveness of the Adopted East Devon Local Plan 2013-2031.)

10. Prior to the occupation of the development hereby permitted, a landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme should give details of the proposed hard surfacing, parking layout, details of soft landscaped areas including planting specification, details of access gate including details of operation and details of boundary treatments. The landscaping scheme and parking areas shall be implemented prior to the occupation of the development and the landscaping shall be maintained for a period of 5 years. Any trees or other plants which die during this period shall be replaced during the next planting season with specimens of the same size and species unless otherwise agreed in writing by the Local Planning Authority. The parking spaces shall be provided in accordance with the submitted details prior to the occupation of the development and shall be maintained at all times thereafter for the lifetime of the development.

(Reason - To ensure that the details are planned and considered at an early stage in the interests of amenity, to preserve and enhance the character and appearance of the area and to ensure adequate parking provision in accordance with Policies D1 - Design and Local Distinctiveness, D2 - Landscape Requirements, Policy EN10 - Conservation Areas, and Policy TC9 - Parking Provision in New Development of the adopted East Devon Local Plan 2013-2031).

11. Prior to the occupation of the development hereby permitted, details of lighting to external doors and to the rear car park shall be submitted to and approved in writing by the Local Planning Authority. The lighting scheme for the rear car park should be designed to comply with BS5489-1:2020.

The lighting shall be provided in accordance with the approved details prior to the occupation of the development.

(Reason: in the interest of safe access, to allow for a safe environment for residents and to reduce the potential for crime in accordance with Policy D1 - Design and Local Distinctiveness of the Adopted East Devon Local Plan 2013-2031.)

12. Prior to the installation of any plant equipment to the second floor external plant area, full details of the external plant including layout and elevations shall be

submitted to and approved in writing by Local Planning Authority. Details of proposed screening to the external plant area shall be submitted to and approved in writing by the Local Planning Authority prior to their installation.

The works shall be carried out in accordance with the approved details and specification.

(Reason - In the interests of the visual amenity of the area, the character and appearance of the Conservation Area and the significance of the heritage asset in accordance with Policy D1- Design and Local Distinctiveness, Policy EN9 - Development Affecting a Designated Heritage Asset and Policy EN10 - Conservation Areas of the adopted East Devon Local Plan 2013-2031.)

13. The specific noise level of any fixed plant or equipment installed and operated on the development must be designed as part of a sound mitigation scheme to operate at a level of 5dB below the sites daytime background sound level (07:00 - 23:00) expressed as LA90 1hr and night-time background sound level (23:00 - 07:00) expressed as LA90 15min, when measured or predicted at the boundary of any noise sensitive property. Any measurements and calculations shall be carried out in accordance with 'BS4142+2014 Methods for Rating and Assessing Industrial and Commercial Sound'.

(Reason: To protect the amenity of local residents from noise in accordance with Policy D1 - Design and Local Distinctiveness and EN14 - Control of Pollution of the adopted East Devon Local Plan 2013-2031).

14. The works shall be carried out in strict accordance with the ecological mitigation, compensation and enhancement measures detailed in Section 3.1 of the Biodiversity Assessment Report undertaken by EAD Ecology, November 2025). A written record shall be submitted to the local planning authority prior to occupation to include photographs of the installed ecological mitigation, compensation, and enhancement measures for bats, bees and nesting birds.

(Reason: To ensure the development avoids adverse impacts on protected species and delivers ecological enhancement in accordance with Strategy 47 - Nature Conservation and Geology, Policy EN5 - Wildlife Habitats and Features, and Policy EN14 - Control of Pollution of the adopted East Devon Local Plan 2013-2031.)

15. Prior to the occupation of the development hereby approved the bicycle storage shall be provided in accordance with the submitted details. The bicycle storage shall be maintained at all times thereafter.

(Reason: To provide adequate parking for bicycles in accordance with Policy TC9 - Parking Provision in New Development of the adopted East Devon Local Plan 2013-2031).

16. Prior to the occupation of the development hereby approved the bin storage shall be provided in accordance with the submitted details. The bin storage shall be maintained at all times thereafter.

(Reason: To provide adequate facilities for refuse, recycling and household waste in accordance with Policy D1 - Design and Local Distinctiveness of the adopted East Devon Local Plan 2013-2031).

17. The development hereby permitted shall be carried out in full accordance with the details approved under the associated Listed Building Consent ref: 25/2398/LBC. All works affecting the fabric, appearance and detailing of the listed building shall be undertaken only in accordance with that consent.

Reason: To ensure that works affecting the significance of the designated heritage asset are controlled through the Listed Building Consent regime and to avoid duplication of conditions.

APPROVE subject to the following conditions on 25/2398/LBC:

1. The works to which this consent relates must be begun not later than the expiration of three years beginning with the date on which this consent is granted.
(Reason - To comply with Sections 18 and 74 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.)
2. The works hereby permitted shall be carried out in accordance with the approved plans listed at the end of this decision notice.
(Reason - For the avoidance of doubt.)
3. No works of demolitions shall begin before evidence has been submitted to the Local Planning Authority of a binding contract for the full implementation of the comprehensive scheme of development

(Reason: To ensure that the partial loss of the listed building is justified by, and directly facilitates, the implementation of the approved scheme, and to safeguard the significance of the designated heritage asset in accordance with Paragraph 217 of the National Planning Policy Framework).

4. Before any work is undertaken to remove any part of the building, the applicant shall take such steps and carry out such works as shall, during the process of the works permitted by this consent, secure the safety and the stability of that part of the building which is to be retained. Such steps and works shall, where necessary, include, in relation to any part of the building to be retained, measures as follows:-
 - a) to strengthen any wall or vertical surface;
 - b) to support any wall, roof or horizontal surface;
 - c) to provide protection for the building against the weather during the progress of the works, and

d) in the case of cob buildings, the details of cob repairs.

Details of any additional necessary repairs required as a result of the works, including methodology, specification or schedule shall be submitted to and approved in writing by the Local Planning Authority before continuing with the works.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

5. Prior to the commencement of development, a full schedule of repairs to the external facades and roof of the building shall be submitted to and agreed in writing by the Local Planning Authority. The schedule shall cover the following details and specifications:

- Full details and findings of the investigations undertaken
- All necessary render repairs including making good following removal of signage.
- All necessary roofing repairs including repairs to pitched roofs, leaded dormer windows, timber fascia and bargeboards, chimney repairs.
- Details of any proposed replacement natural slates and ridge tiles, to include the method of fixing of the slates.
- Making good following removal of external fire escape stairs
- Making good following removal of extensions proposed for demolition, including details or repairs and proposed finishes.
- All necessary window repairs including details of proposed replacement timber, paint finish and colour
- A timetable for the repair works to be undertaken.

The works shall be carried out and completed in accordance with the approved details and specification within the agreed timeframe within the schedule.

(Reason - A pre-commencement condition is required to ensure that the repairs and restorations to The Royal Beacon are fully understood and considered at an early stage in the interests of the architectural and historic character of the heritage asset and to ensure that the repairs to The Royal Beacon are secured and heritage and public benefits are realised in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

6. Prior to the commencement of any demolition and creation of new openings, Structural Engineers Drawings, specification and schedule of works shall be submitted to and approved in writing by the Local Planning Authority.

The works shall be carried out and completed in accordance with the approved details and specification.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

7. Before the relevant parts of the works begin on the items specified below, the following details and specification for these items shall be submitted to and approved in writing by the Local Planning Authority:

- Details of roofing slate including, ridge tiles and method of fixing.
- New rainwater goods and soil pipes including profiles, materials and finishes.
- Lead work, including profiles and details of any ornamentation.
- Roof ventilation systems.
- New external windows and doors including sections, mouldings, profiles, details of reveals and paint colour. Sections through casements, frames and glazing bars should be at a scale of 1:2 or 1:5.
- Replacement external windows and doors including sections, mouldings, profiles, details of reveals and paint colour. Sections through casements, frames and glazing bars should be at a scale of 1:2 or 1:5.
- Eaves and verge details including construction and finishes.
- External vents, flues and meter boxes.
- Sample of new bricks including mortar colour and specification and bond type.
- Type of render including proportions of mix, method of application and finishes.
- Colour of limewash or suitable microporous paint for the new lime based render.

The works shall be carried out in accordance with the approved details and specification.

(Reason - In the interests of the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

8. The rooflight indicated on the approved plans shall be of a conservation design with integral bar and flush with the roof, the model specification of which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of these works.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

9. Before the relevant parts of the works begin on the items specified below, the following details and specification for these items shall be submitted to and approved in writing by the Local Planning Authority:

- Masonry crack repairs to the basement chimney breast
- Damp proofing works to the basement

The works shall be carried out in accordance with the approved details and specification.

(Reason - In the interests of the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

10. Before the relevant parts of the works begin on the items specified below, the following details and specification for these items shall be submitted to and approved in writing by the Local Planning Authority:

- Details of mezzanine floor to ballroom including details of mezzanine structure and fixing details to existing masonry walls, details of proposed floor level, and details of making good
- Details of floor and ceiling finish
- Details of mezzanine balustrade and stair details including handrail

The works shall be carried out in accordance with the approved details and specification.

(Reason - In the interests of the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031).

11. Before the relevant parts of the works begin on the items specified below, the following details and specification for these items shall be submitted to and approved in writing by the Local Planning Authority:

- Internal door schedule with details of doors to be retained and details including elevations of replacement doors, and details of ironmongery and architraves.
- Details of new internal skirtings, cornicing, window surrounds and picture rails where applicable.
- Details of proposed acoustic and fire resistant linings to be applied to existing internal partitions
- Details of construction of new internal partitions
- Details of replacement plaster finishes including plaster specification and details of paint finish.
- Schedule and specification of proposed visible electrical fittings including switches and sockets.

All original internal doors are to be retained and re-used within the building unless otherwise approved. The works shall be carried out in accordance with the approved details and specification.

(Reason - In the interests of the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

12. Where panel doors, linings and architraves are to be removed they shall be carefully removed, stored under cover and re-used on site in accordance with the approved works, unless otherwise agreed in writing by the Local Planning Authority. Existing historic architraves are to be retained unless otherwise approved and details of any changes should be submitted for approval.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

13. The windows hereby permitted shall be recessed in the wall to match the existing windows.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 (Development Affecting a Designated Heritage Asset) of the Adopted Devon Local Plan 2013-2031.)

14. Where partitions are to be removed in accordance with the approved works, the work shall be made good to match the original.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

15. Where new partitions are constructed in accordance with the approved works they shall be scribed around (not cut into) existing cornices, skirtings or other features. Existing historic skirtings and cornices to be retained unless otherwise approved and details of any changes should be submitted for approval.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

16. Rooms with cornices, moulded skirtings or other features which are to be divided in accordance with the approved works, shall have new lengths of cornice, skirtings or other features to match existing unless otherwise agreed in writing by the Local Planning Authority. Existing historic joinery to be retained unless otherwise approved and details of any changes should be submitted for approval.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

17. The fire surround in the south eastern street facing ground floor room shall be retained in the original position and shall be protected during the whole period of alterations by a plywood box cover mounted on a timber frame.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

18. Any damage caused by or during the course of the carrying out of the works hereby permitted shall be made good in matching materials after the works are complete.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

19. There shall be no bell end render stops or metal beading to the proposed rendered areas.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

20. The internal face of existing external walls shall not be lined.

(Reason - To safeguard the architectural and historic character of the building in accordance with Policy EN9 - Development Affecting a Designated Heritage Asset of the Adopted East Devon Local Plan 2013-2031.)

NOTE FOR APPLICANT

Informative:

In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 in determining this application, East Devon District Council has worked positively with the applicant to ensure that all relevant planning concerns have been appropriately resolved.

Biodiversity Net Gain Informative:

Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 means that this planning permission is deemed to have been granted subject to "the biodiversity gain condition" (BG condition).

The Local Planning Authority cannot add this condition directly to this notice as the condition has already been applied by law. This informative is to explain how the biodiversity condition applies to your development.

The BG conditions states that development may not begin unless:

- (a) a Biodiversity Gain Plan (BG plan) has been submitted to the planning authority, and
- (b) the planning authority has approved the BG plan.

In this case the planning authority you must submit the BG Plan to is East Devon District Council.

There are some exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are listed below.

Based on the information available this permission is considered to be one which will **not require the approval of a biodiversity gain plan** before development is begun because one or more of the statutory exemptions or transitional arrangements in the list below is/are considered to apply.

In this case exemption 4.2 from the list below is considered to apply:

Statutory exemptions and transitional arrangements in respect of the biodiversity gain condition.

1. The application for planning permission was made before 12 February 2024.
2. The planning permission relates to development to which section 73A of the Town and Country Planning Act 1990 (planning permission for development already carried out) applies.
3. The planning permission was granted on an application made under section 73 of the Town and Country Planning Act 1990 and
 - (i) the original planning permission to which the section 73 planning permission relates was granted before 12 February 2024; or
 - (ii) the application for the original planning permission to which the section 73 planning permission relates was made before 12 February 2024.
4. The permission which has been granted is for development which is exempt being:
 - 4.1 Development which is not 'major development' (within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015) where:
 - (i) the application for planning permission was made before 2 April 2024;
 - (ii) planning permission is granted which has effect before 2 April 2024; or
 - (iii) planning permission is granted on an application made under section 73 of the Town and Country Planning Act 1990 where the original permission to which the section 73 permission relates* was exempt by virtue of (i) or (ii).
 - 4.2 Development below the de minimis threshold, meaning development which:
 - (i) does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and

(ii) impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).

4.3 Development which is subject of a householder application within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. A "householder application" means an application for planning permission for development for an existing dwellinghouse, or development within the curtilage of such a dwellinghouse for any purpose incidental to the enjoyment of the dwellinghouse which is not an application for change of use or an application to change the number of dwellings in a building.

4.4 Development of a biodiversity gain site, meaning development which is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the Biodiversity Gain Planning condition which applies in relation to another development, (no account is to be taken of any facility for the public to access or to use the site for educational or recreational purposes, if that access or use is permitted without the payment of a fee).

4.5 Self and Custom Build Development, meaning development which:

- (i) consists of no more than 9 dwellings;
- (ii) is carried out on a site which has an area no larger than 0.5 hectares; and
- (iii) consists exclusively of dwellings which are self-build or custom housebuilding (as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015).

Irreplaceable habitat

If the onsite habitat includes irreplaceable habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans.

The Biodiversity Gain Plan must include, in addition to information about steps taken or to be taken to minimise any adverse effect of the development on the habitat, information on arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.

The planning authority can only approve a Biodiversity Gain Plan if satisfied that the adverse effect of the development on the biodiversity of the irreplaceable habitat is minimised and appropriate arrangements have been made for the purpose of compensating for any impact which do not include the use of biodiversity credits.

Bats

The applicant is advised that bats and their roosts are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). It is an offence to deliberately capture, injure, kill or disturb bats, or to damage or destroy a breeding site or resting place. Should bats or evidence of a roost be encountered during construction, all works must cease immediately, and a suitably licensed

ecologist must be consulted. Under no circumstances should contractors attempt to handle bats. Further guidance is available from GOV.UK and the Bat Conservation Trust (www.bats.org.uk).

Nesting Birds

All wild birds, their nests and eggs are protected under the Wildlife and Countryside Act 1981 (as amended). It is an offence to intentionally damage or destroy an active nest or to disturb nesting birds. To avoid committing an offence, vegetation clearance, demolition and similar works should be undertaken outside the main nesting season (March to August inclusive). Where this is not possible, works should be preceded by a check for active nests by a suitably qualified ecologist. If any active nests are identified, works must cease in the immediate area until the young have fledged and the nest is no longer in use.

South West Water response relates to surface water discharge to our network, where the discharge is from buildings and yards belonging to buildings. Where the applicant has highlighted that the surface water does not connect to South West Water network, we are not commenting on this as it is not our responsibility.

South West Water has no duty to accept land drainage runoff, flows from natural watercourses or groundwater to the public sewer system, and this is not permitted to discharge to the South West Water network. The applicant should make alternative arrangements to deal with this separately during the development and once the construction work is complete.

South West Water are not responsible for Highway Drainage and our comments do not relate to accepting any of these flows. The applicant should discuss and agree with the Highway Authority, where the highway water connects to.

If the applicant wishes to connect this development to the South West Water network, they should engage with us separately to see if we can accommodate this. No highway drainage will be permitted to be discharged to SWW foul or combined public sewer network either directly or indirectly.

If the applicant is looking to have their sewers adopted (surface and foul), they should design and construct the sewers to the current version of the Design and Construction Guidance. The process for doing this can be found on South West Water's website at Adoption of new sewers | Building & Development | South West Water

Plans relating to this application:

01000 REV P1	Location Plan	21.11.25
21002 P2 : demolition ground	Proposed Floor Plans	01.04.26
22012 S2 P08	Proposed Floor Plans	08.05.26

32001 S2 P05	Proposed Elevation	08.05.26
21001 P2 : demolition lower ground	Proposed Floor Plans	01.04.26
22011 P07 : ground	Proposed Floor Plans	01.04.26
21003 P02 : demolition first	Proposed Floor Plans	01.04.26
22013 P6 : second	Proposed Floor Plans	01.04.26
21004 P2 : demolition 2nd/3rd floor	Proposed Floor Plans	01.04.26
22014 P5 : third	Proposed Floor Plans	01.04.26
22015 P2	Proposed roof plans	01.04.26
22010 P6 : lower ground	Proposed Floor Plans	01.04.26
12001 P3	Proposed Site Plan	01.04.26
32002 P04 : car park view	Proposed Elevation	01.04.26

List of Background Papers

Application file, consultations and policy documents referred to in the report.

Local Consultations

Parish/Town Council

Meeting 13.04.26

Objection sustained, the proposal was still considered to be overdevelopment of the site.

Parish/Town Council

Meeting 26.05.26

Objection sustained: Members remained concerned that the scale of the proposed development would result in increased traffic movements and on-street parking within a highly constrained area, in close proximity to The Beacon Primary School. It was also not evident that all heritage-related concerns had been fully addressed.

Parish/Town Council

Meeting 05.01.26

Objection: Members believed the number of proposed apartments constitutes overdevelopment of the site. Furthermore, there was concern regarding the absence of a thorough historic investigation, which risked erasing or damaging heritage assets without proper consideration.

Technical Consultations

County Highway Authority

09/02/2026

I have visited the site and reviewed the planning application documents.

Taking into account the former hotel use, I am satisfied that vehicle trip generation intensification will not be a problem, as a similar trip generation benchmark has been set a precedent.

The cycle storage will help encourage sustainable travel and though there are fewer parking spaces provided than proposed units, Exmouth holds many sustainable travel options such as the train, regular bus services, taxi services and the Ex-estuary cycle trail. Exmouth also benefits from an array of local services and facilities from Health, Leisure, Education and commercial.

However, the garage parking provided needs to be accessed safely and the visibility splay onto Beacon Close appears very close to the Louisa Terrace Junction, with no visibility splays provided. Therefore until this information is provided, I recommend refusal.

Recommendation:

THE DIRECTOR OF CLIMATE CHANGE, ENVIRONMENT AND TRANSPORT, ON BEHALF OF DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, IS LIKELY TO RECOMMEND REFUSAL WITHOUT FURTHER INFORMATION.

County Highway Authority

Addendum 25/05/2026

The County Highway Authority (CHA) has reviewed the additional information provided through the re-consultation, we are therefore happy to drop our stance of objection.

Conservation

20.02.2026

Significance and background

The Royal Beacon Hotel is a Grade II listed hotel incorporating numbers 22 and 23 The Beacon and is a substantial three-storey building with a basement and attic at the end of this prominent terrace. The original part of the building (number 23)

understood to have been constructed in c1810 as a private dwelling. The pitched roof is slated with wide bracketed eaves and later dormer windows. The façade is in white render with a range of three windows; the top floor outer windows are three-light one over one sashes and below these are later three-storey bays below balustraded parapets, each with three one over one sash windows. In the centre is a round arched door with a keystone and flat roofed porch with an iron balustraded parapet, this entrance is accessed via a short flight of steps from the road. On the front boundary are railings set into a retaining wall.

On the side elevation, the windows are multi-paned sashes within the original building and later extension, and on the rear elevation is a slate hung bow and a round arched staircase window. Extending from the rear of the building is a substantial late C19 three-storey pitched roofed extension which incorporates the ballroom and has been altered in recent years with a mansard roof constructed on the west pitch facing the courtyard, and to the rear of this is a flat roofed two-storey block which was constructed in the 1980's, with an archway leading into a courtyard where there is limited parking and rear access to the building.

Adjoining the original hotel within the same terrace is 22 The Beacon. This property dates to the late C19 and is a former dwelling that is understood to have been incorporated into the hotel in the 1950's. It is also three-storeys with a basement. This has bay windows on the front elevation and a pitched slate roof, with a painted brick façade. On the rear elevation is a slate hung bow and a round arched staircase window.

The building is situated on prominent elevated land overlooking the seafront at Exmouth, within the Exmouth 1 and 2 Conservation Area.

A heritage statement has been submitted with the application and includes a phasing plan. Areas of high, medium and low significance have been identified, along with negative contributors. The original building to the front is of the highest significance, with the ballroom extension behind of medium significance, and the 20th/21st century additions including the 1980's extension are low to negative. Internally, few historic features survive, and these include historic features within the ballroom and fireplaces.

Assessment

The application proposes the conversion of the hotel into residential apartments to secure a long-term viable use for the building. The application states that the hotel business has run at a loss for many years due in part to extremely limited parking provision in this location. As a result, ongoing maintenance is becoming an issue, and this is putting the listed building at potential risk. Both 22 and 23 The Beacon were originally dwellings, although 23 has been a hotel since the C19, with additions such as the rear wing incorporating the ballroom and later piecemeal additions. The principal of the conversion is likely to be acceptable in heritage terms, subject to a carefully considered design which preserves the character and significance of the building including internal features of significance.

The proposed works are assessed below.

Externals

The application states that repairs will be carried out to the building and these are outlined in the Heritage Scope of Works within the Design and Access Statement. There is limited detail of the proposed repairs within the application and assumptions have been made as no condition survey has been carried out. If the application is supported, we would require reassurance that the maintenance and repair of the building will be carried out as part of the proposal to address existing defects and prevent deterioration, and full details will need to be submitted for approval, either by condition or as a separate application where listed building consent is required. This would include roof and rainwater good repairs, overhaul and repair or replacement of windows, and external masonry repairs where necessary.

Front elevation

No external alterations are proposed to the front elevation other than the removal of signage and repairs where necessary. The general comments above apply here.

Side elevation

The demolition of the single storey basement access on the side of the building is proposed and as a modern addition of no significance this is accepted. Replacement steps to the basement are proposed in this location, with railings to match the existing. If the application is supported, details of the steps and railings, along with making good of the external walls, need to be submitted for approval.

Rear of the main building

There are several piecemeal extensions of varying ages at the rear of the hotel within the courtyard. These include several post-1950's additions which have no significance, and their demolition will reveal the historic building and provide useable space within the courtyard.

There is a three-storey flat roofed outshut at the rear of the original house between the bay of 22 The Beacon and the bay of the adjacent property. The phasing plan shows that this is partially mid-late C19 with the upper floor added in 1998. It has low significance, having been heavily altered over the years, and its removal will be an enhancement as it will reveal the historic rear elevation. Attached to this at ground floor level is a single storey extension extending alongside the boundary. This dates to the mid-late C19 and is of low significance, being utilitarian in character and heavily altered internally. Its demolition will provide space within the courtyard and improve the viability of the building and therefore its demolition is also accepted. New multi-paned windows are proposed on the rear of the main house following this demolition and as they reflect the design and character of the historic windows on the same elevation this will be an enhancement, subject to details of the joinery and masonry repairs being submitted for approval

A three-storey pitched roof projection is attached to the side of the ballroom extension and may be contemporary with it. On the north elevation are historic multi-paned sash windows on the upper floors which contribute to the historic interest, and this structure makes some contribution to the character and evolution of the building. Its demolition has been justified to some degree, although it could be incorporated into the conversion. A pre-1959 slate clad extension to this structure and adjacent fire escape makes a negative contribution to character and their demolition is

supported subject to details of making good the external walls being submitted for approval

New multi-paned windows are proposed on the courtyard elevation of the C19 range and the rear of the main house. Again, they reflect the design and character of the historic windows on these elevations, and where they reinstate historic openings, they are acceptable subject to joinery details being submitted for approval. Although the proposed windows on the NW elevation of the ballroom are accepted as a sensitive external intervention, I have concerns about the impact on the character of the ballroom itself.

Where replacement of new external doors is proposed on the same elevation, details will need to be submitted for approval.

Rear two-storey extension

A large 1980's flat roofed extension at the rear of the hotel wraps around the corner of the site and is in a prominent corner within the conservation area. This structure replaced the historic coach house and, although it is rendered to reflect the character of the main building and has ranges of large windows which broadly reflect the character of the side elevation, it has very little architectural merit and makes a negative contribution to the character of the host building and the conservation area. The demolition of this structure is therefore supported.

The north-east side of Beacon Place is characterised by the rear elevations and gardens of the properties on The Beacon (all Grade II listed), along with two 2-storey dwellings, ancillary buildings of various forms and heights including garages and rear extensions and these are predominantly in red brick and render with pitched roofs. The rear of The Royal Beacon is also within the setting of the Grade II* listed Holy Trinity Church with its tower visible from Beacon Place. There is also a tall Grade II curtilage listed stone boundary wall to the south-east of the site on Louisa Terrace.

A two and three storey extension is proposed in place of the existing, and the principle of a replacement building is accepted as it provides an opportunity to enhance the site with a building that harmonises with the prevailing character in this part of the conservation area and complements the character of the host building. The articulation of the proposed extension goes some way towards reflecting the different forms on this side of the street and breaks up the monotony of the existing extension, and the recessed balconies are an interesting design detail. However, I have concerns about the design in context with the wider conservation area. The mansard roofs are felt to be out of character with the local style and a more sensitive approach would be traditional pitched roofs, perhaps with inset balconies rather than outdoor terraces. There is a precedent for garages facing Beacon Place so this could be acceptable.

A plant area is proposed on the roof of the archway into the courtyard. Will the plant be visible from outside the site?

Internals

Internally, there are few architectural details of significance as the building has been altered and remodelled over the years. C19 detailing is believed to survive within the reception area, ballroom and an historic fireplace on the ground floor, and these have been identified in the heritage statement. The application also indicates that there are historic joinery details such as internal doors, skirtings and architraves. The phasing plans included within the application show internal walls that have been added post 1950 and these are predominantly the en-suite partitions and the lift shaft, and these plans indicate that most of the other walls including bedrooms and corridors form part of an earlier layout, suggesting that they may be original or at least C19.

Basement

The basement has been altered in the past to create an open plan restaurant and there are very few surviving historic features and details except for historic chimney breasts, fireplace openings and surviving structural walls. The proposal seeks to reinstate internal walls and construct some new partitions, and this is supported. If the application is supported, details of the proposed structural repairs within the basement should be submitted for approval.

Ground floor

The entrance foyer currently leads to several ground floor rooms including lounges and bar areas, along with a staircase to the first floor. The application proposes to subdivide the ground floor into apartments, with most of the existing walls demolished and new partitions constructed, with a small entrance area retained. At the rear of GF apartment 1, the historic rear bay window will be reinstated following the demolition of the rear extension and this will be an enhancement. It is accepted that internal layout changes have been carried out in the past as shown on the phasing plan. The proposed changes at this level are generally acceptable, although the demolition of some surviving historic internal walls has not been fully justified and it is unclear why the conversion cannot be designed to work more sensitively with the existing layout.

Ballroom

The ballroom is a surviving feature of the mid-late C19 hotel extension and is a grand double height open plan space which retains historic detailing including plaster cornices and entrance doors. Some alterations have been carried out in the past including the more recent panels and infilled archway on the north-west wall and a large opening at the north-east end, although it still retains significance as an impressive space.

It is accepted that the ballroom is a difficult space to incorporate into a residential conversion, however the design of the proposed subdivision of the ballroom to create two apartments is of concern. A wall is proposed across the centre of the room and cuts through the space, with mezzanines proposed which, according to the application, preserve the proportions and grandness. It is felt that the conversion of this space could be approached more sensitively, perhaps by creating a single apartment with more open plan space and using the existing double doors instead of creating new openings.

To the south of the ballroom is a small landing and staircase which lead to these double doors. The application proposes to retain and enclose the doors within the wall so that the historic fabric is retained and can be revealed in the future, with a circulation staircase constructed in the existing circulation area. To avoid the loss/concealment of a surviving historic feature, the layout within this area should be reconsidered so that the doors can be incorporated into the design.

Upper floors

The first, second and third floors are mostly subdivided into guest rooms with en-suites, with corridors accessing them. There are no significant internal architectural details within these areas although the phasing plans indicate that the plan form is early. The application proposes the internal demolition of almost every internal wall within the original building and the full reconfiguration of the first and second floors, with the construction of new partitions between rooms and a full height blockwork wall to the circulation area at all levels. Insufficient justification has been submitted for the extent of alterations, and no structural report has been submitted to demonstrate that the building is capable of this level of intervention. This element of the application is concerning, and a more sensitive approach would be to reconsider the apartment layouts in line with the existing layout so that historic partitions can be retained.

The reconfiguration of the third floor is acceptable as this was converted in the late C20 and has low significance.

The Design and Access Statement states that following the reconfiguration of the interior of the building, all new fire doors will be in a heritage style, and therefore joinery details will need to be submitted for approval. It also states that original internal doors will be re-used in appropriate locations but does not specify where so this needs to be clarified.

It also states that the internal walls of circulation spaces will be lined, with architectural details such as skirtings, architraves and skirtings removed and re-applied or boxed in. It suggests the same approach for external walls. This approach needs to be justified clearly with details of the proposals submitted for approval if they are acceptable. Lining external walls is unlikely to be supported.

Conclusion

In conclusion, the principle of the conversion is accepted, however there are concerns with the extent of internal demolition and subdivision, along with the design of the new buildings at the rear. Further consideration needs to be given to the proposal, along with more information and a more sensitive approach which preserves and enhances the listed building. Great weight should be given to the conservation of the listed building, and any harm should require clear and convincing justification and should be outweighed by sufficient public benefits. The proposed works have been assessed on heritage grounds, particularly with regards to our statutory duties under sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, policies EN8 and EN9 of the East Devon Local Plan and paragraphs 212, 213, 215, 217 and 219 of the NPPF (December 2024 as amended). It has also been assessed in relation to emerging

policies HE01, HE02 and HE03 of the East Devon Local Plan 2020-2042 Regulation 19 Publication Draft February 2025.

Recommendation: Object in its current form

Sue Brooks
Conservation Officer
20 February 2026

Conservation
05/06/2026

Assessment

Following my previous consultation response, amendments have been made to the proposal and as before the principle of conversion from a hotel into apartments is acceptable in heritage terms. Elements of the proposal are assessed below following amendments.

Externals

As before, the maintenance and repair of the building should be carried out as part of the proposal, as stated in the application, to address existing defects and prevent deterioration, with full details submitted by condition. This includes roof and rainwater good repairs, overhaul and repair or replacement of windows, and external masonry repairs where necessary.

Side elevation

The demolition of the single storey basement access on the side of the building is accepted as this is a later intervention. Details of the proposed replacement steps and railings, along with making good of the external walls, need to be submitted for approval.

Rear of the main building

I have no objections to the proposed demolitions at the rear of the building within the courtyard as these have now been sufficiently justified, subject to details of making good the external walls following demolition being submitted for approval.

New multi-paned windows to the courtyard facing elevations are acceptable, along with the proposed new and replacement doors, subject to details of the joinery and masonry repairs being submitted for approval.

Rear two-storey extension

As before, the demolition of the large 1980's flat roofed extension at the rear of the hotel is supported, along with the principle of a replacement building, subject to a design which harmonises with the prevailing character in this part of the conservation area and enhances the rear boundary of the site.

Following negotiations, the design of the replacement has been amended and is now accepted in heritage terms as it is an enhancement on the existing, with a more

articulated design and references taken from the wider context. The impact on the setting of the Grade II* listed Holy Trinity Church nearby is felt to be neutral.

Internals

As there are few internal features of significance throughout the building, the reconfiguration of the interior to accommodate residential accommodation is accepted in principle.

Basement

The proposed basement alterations are supported, subject to details of the proposed structural repairs being submitted for approval.

Ground floor

The proposed layout has been amended to work more sensitively with the existing layout, with surviving architectural features retained and some elements reinstated, including the historic rear bay window and original internal walls between the two properties. The proposed changes at this level are now acceptable.

Ballroom

Amendments have been made to this space following negotiations, with the subdivision reduced to maintain the legibility of the space and the doorway and double doors retained and incorporated into the design. This is now acceptable, subject to details of interventions being submitted for approval.

Upper floors

The first, second and third floors are mostly subdivided into guest rooms with en-suites, with corridors accessing them. There are no significant internal architectural details within these areas although the phasing plans indicate that the plan form is early. Following negotiations, the extent of demolition and alteration has been reduced to maintain the legibility of the plan form whilst providing adequate habitable spaces. The reconfiguration of the third floor is acceptable as this was converted in the late C20 and has low significance.

Architectural details such as skirtings and architraves shall be retained unless otherwise approved and details of any changes should be submitted for approval. Lining external walls is unlikely to be supported.

Conclusion

In conclusion, the principle of the conversion is accepted, and following negotiations the internal alterations have been reduced and amended to allow the legibility of the surviving historic plan form to be understood, with important spaces and elements such as the ballroom maintained in a legible form. The proposal is sufficiently justified in heritage terms, and elements of less than substantial harm such as the subdivision of the ballroom and internal alterations are outweighed by the public benefits of ensure the long-term viability of an under-used listed building. Other elements of the proposal are an enhancement on the existing, including the removal of later additions to reveal the historic rear elevations and the proposed extensions on the rear boundary. The conversion and restoration of the building will enhance the character of the conservation area.

The proposed works have been assessed on heritage grounds, particularly with regards to our statutory duties under sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, policies EN8, EN9 and EN10 of the East Devon Local Plan and paragraphs 212, 213, 215, 217 and 219 of the NPPF (December 2024 as amended). It has also been assessed in relation to emerging policies HE01, HE02 and HE03 of the East Devon Local Plan 2020-2042 Regulation 19 Publication Draft February 2025. Following negotiations and amendments, the proposal complies with these policies.

Recommendation: No objections subject to conditions

Recommended Conditions

Submitted to Planning Officer separately.

Sue Brooks
Conservation Officer
5 June 2026

DCC Historic Environment Officer - Stephen Reed/archaeology
05.01.2026

The proposed development involves the conversion of a nationally important designated heritage asset from a hotel to residential use, as well as the creation of two new mews style dwellings at the rear of the site. These proposed works have the potential to impact upon the historic fabric of the listed building and upon below-ground archaeological and artefactual deposits associated with the late 18th and early 19th century expansion of Exmouth into this area. The impact of development upon the historic building and the archaeological resource should be mitigated by a programme of (i) historic building recording to ensure there is an appropriately detailed record of the extant building prior to conversion and (ii) archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be destroyed by the proposed development.

The Historic Environment Team therefore recommends that this application should be supported by the submission of a Written Scheme of Investigation (WSI) setting out a programme of heritage work to be undertaken in mitigation for the impact upon the heritage assets her. The WSI should be based on national standards and guidance and be approved by the Historic Environment Team.

If a Written Scheme of Investigation is not submitted prior to determination the Historic Environment Team would advise, for the above reasons and in accordance with paragraph 218 of the National Planning Policy Framework (2024) and Policy EN6 (Nationally and Locally Important Archaeological Sites) of the East Devon Local Plan, that any consent your Authority may be minded to issue should carry the condition as worded below, based on model Condition 55 as set out in Appendix A of Circular 11/95, whereby:

'No development shall take place until the developer has secured the implementation of a programme of (i) historic building recording and (ii) archaeological work in

accordance with a written scheme of investigation (WSI) which has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out at all times in accordance with the approved scheme as agreed in writing by the Local Planning Authority.'

Reason

'To ensure, in accordance with Policy EN6 (Nationally and Locally Important Archaeological Sites) of the East Devon Local Plan and paragraph 218 of the National Planning Policy Framework (2024), that an appropriate record is made of the historic building fabric and any archaeological evidence that may be affected by the development.'

This pre-commencement condition is required to ensure that the archaeological works are agreed and implemented prior to any disturbance of archaeological deposits by the commencement of preparatory and/or construction works.

Please note that this is a variation of the usually recommended archaeological condition.

In addition, the Historic Environment Team would advise that the following condition is applied to ensure that the required post-excavation works are undertaken and completed to an agreed timeframe:

'The development shall not be occupied until the post investigation assessment has been completed in accordance with the approved Written Scheme of Investigation. The provision made for analysis, publication and dissemination of results, and archive deposition, shall be confirmed in writing to, and approved by, the Local Planning Authority.'

Reason

'To comply with Paragraph 218 of the National Planning Policy Framework (2024), which requires the developer to record and advance understanding of the significance of heritage assets, and to ensure that the information gathered becomes publicly accessible.'

I would envisage a suitable programme of work as taking the form of (i) a record of the extant historic building made prior to the development commencing as well as being supplemented by observations - as and if required - during conversion and demolition works and (ii) the archaeological supervision of all groundworks associated with the development to allow for the identification, investigation and recording of any exposed archaeological or artefactual deposits associated with . The results of the fieldwork and any post-excavation analysis undertaken would need to be presented in an appropriately detailed and illustrated report, and the finds and archive deposited in accordance with relevant national and local guidelines.

I will be happy to discuss this further with you, the applicant or their agent. The Historic Environment Team can also provide the applicant with advice on the scope of the works required, as well as contact details for archaeological contractors who would be able to undertake this work. Provision of detailed advice to non-householder developers may incur a charge. For further information on the historic

environment and planning, and our charging schedule please refer the applicant to:
<https://new.devon.gov.uk/historicenvironment/development-management/>.

Devon County Council Education Dept

09.01.2026 - Regarding the above planning application, Devon County Council has identified that a development of 15 family type dwellings will generate an additional 3.75 primary pupils and 2.25 secondary pupils.

When factoring in both approved but unimplemented housing developments as well as outstanding local plan allocations DCC has forecast that there is enough spare primary and secondary capacity to accommodate the number of pupils expected to be generated from this development. A contribution towards primary and secondary education will therefore not be sought against this development.

DCC Flood Risk Management Team

22.01.2026 - At this stage, we object to this planning application because we do not believe that it satisfactorily conforms to Policy EN22 (Surface Run-Off Implications of New Development) of the East Devon Local Plan (2013-2031). The applicant will therefore be required to submit additional information in order to demonstrate that all aspects of the proposed surface water drainage management system have been considered.

Observations:

The applicant has submitted Royal Beacon Hotel, Exmouth Design and Access Statement (Document No. 4970-KEA-XX-XX-RP-A-90003-S2-P01, Rev. -, no date), Planning Statement (dated 14th November 2025) and Proposed Site Plan (Drawing No. 12001, Rev. P2, dated 8th December 2025) to support the development of a change of use and associated demolitions and proposed conversion of a grade II listed hotel, to 20no. 1, 2 and 3 bed apartments with basement storage, associated parking and infrastructure as well as the demolition of the rear modern block to provide 2 newbuild semi-detached mews houses including integrated garages.

The existing site is currently a hotel, with buildings and car park.

The boundary of the western corner of the site is partially at medium risk of flooding from surface water. The applicant shall assess this risk of flooding when finalising the design and drainage strategy.

A combined sewer runs down Louisa Terrace.

The applicant should survey the existing surface water drainage system (including gutters and rainwater downpipes) to ensure that it is within a suitable condition.

The applicant has not provided any information in relation to the disposal of surface water from the site to enable me to make observations on the proposal. The applicant must therefore submit a surface water drainage management plan which demonstrates how surface water from the development will be disposed of in a manner that does not increase flood risk elsewhere, in accordance with the principles of Sustainable Drainage Systems. The applicant is therefore advised to refer to Devon County Council's draft Sustainable Drainage Design Guidance, which can be found at the following address:

<https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/>.

DCC Flood Risk Management Team

24.04.2026 - At this stage, we object to this planning application because we do not believe that it satisfactorily conforms to Policy EN22 (Surface Run-Off Implications of New Development) of the East Devon Local Plan (2013-2031). The applicant will therefore be required to submit additional information in order to demonstrate that all aspects of the proposed surface water drainage management system have been considered.

Observations:

The applicant has submitted a Flood Risk Assessment and Drainage Strategy (Job No. 10946, Rev. 2, dated March 2026)

The applicant has stated that the existing hotel is served by both foul and surface water drainage which connect into the 750mm diameter combined public sewer within Louisa Terrace.

It is noted there will be no increase in impermeable catchment area at the site.

The applicant has proposed the use of a rain garden and attenuation tank with a hydrobrake restricting flows to 5.0l/s.

The applicant should assess the potential for using permeable paving in the car park.

Section 4.8 of the FRA and the Drainage Strategy (Drawing No. 10946/502, Rev. A, dated 17th March 2026) notes the attenuation tank with dimensions of 10.0m x 5.0m x 0.75m and takes a catchment area of 0.083ha.

The site is stated to "be split into two catchment areas, where the exterior roof elevations of the development will drain, as existing, while the internal roof elevations and paved areas will be re-routed through attenuation and SuDS features".

The Drainage Strategy notes the existing combined connection to the SWW combined sewer is to be retained.

The applicant should survey the existing surface water drainage system which will be used (including gutters and rainwater downpipes) to ensure that it is within a suitable condition. A CCTV survey should be completed and the results submitted to the LPA.

A Cv value of 1.0 shall be used.

Following the update of the Flood Risk Assessments: Climate Change Allowances document in May 2022 by central government, the applicant will be required to use the new climate change uplift value when sizing the proposed surface water drainage management system for this development.

The onsite drainage and SuDS devices will remain private and be the maintenance responsibility of a private management company as appointed by the developer.

DCC Flood Risk Management Team

28.05.2026 - Our objection is withdrawn and we have no in-principle objections to the above planning application at this stage, assuming that the following pre-commencement planning conditions are imposed on any approved permission:

No development hereby permitted shall commence until the following information has been submitted to and approved in writing by the Local Planning Authority:

(a) A detailed drainage design based upon the Flood Risk Assessment and Drainage Strategy (Job No. 10946, Rev. 3, dated May 2026).

(b) Detailed proposals for the management of surface water and silt runoff from the site during construction of the development hereby permitted.

(c) Proposals for the adoption and maintenance of the permanent surface water drainage system.

(d) A plan indicating how exceedance flows will be safely managed at the site.

(e) A detailed assessment of the condition and capacity of any existing surface water drainage system/watercourse/culvert that will be affected by the proposals. The assessment should identify and commit to, any repair and/or improvement works to secure the proper function of the surface water drainage receptor.

No building hereby permitted shall be occupied until the works have been approved and implemented in accordance with the details under (a) - (e) above.

Reason: The above conditions are required to ensure the proposed surface water drainage system will operate effectively and will not cause an increase in flood risk either on the site, adjacent land or downstream in line with SuDS for Devon Guidance (2017) and national policies, including NPPF and PPG. The conditions should be pre-commencement since it is essential that the proposed surface water drainage system is shown to be feasible before works begin to avoid redesign / unnecessary delays during construction when site layout is fixed.

Observations:

The applicant has submitted a revised Flood Risk Assessment and Drainage Strategy (Job No. 10946, Rev. 3, dated May 2026).

The applicant has increased the size of the attenuation tank.

The Drainage Strategy (Drawing No. 10946/25, Rev. B, dated 18th May 2026) notes the dimensions as 10.0m x 6.0m x 0.75m.

A Cv value of 1.0 and climate change allowance of 45% has been used.

The discharge rate remains as 5.0l/s.

The applicant shall assess the use of permeable paving in the car park area.

Economic Development Officer

11.05.2026 - The Economic Development team has reviewed both the viability report submitted by the applicant and the independent second opinion commissioned by the Council. Both assessments conclude that the hotel is not currently viable as a trading business and that only very substantial capital investment, alongside a significant uplift in sales performance, would enable it to operate profitably as a

going concern. The property has been actively marketed for an extended period, during which no credible interest has emerged that would be capable of delivering the level of investment required. In light of these commercial realities, the Economic Development team raises no objection to the proposed application.

EDDC District Ecologist

06.05.2026 - The application is supported by a Biodiversity Assessment Report (EAD Ecology, November 2025). The bat survey results indicate that the building is unlikely to support roosting bats. Nevertheless, the report acknowledges that the proposed development has the potential to impact nesting birds. Any survey constraints have been clearly set out and are considered to be reasonable and adequately justified.

The mitigation, compensation and enhancement measures detailed in Section 3.1 of the Biodiversity Assessment Report are considered appropriate for the scale of development and should be implemented in full and secured by condition.

It is also recommended that the following informatives are attached to any grant of planning permission:

1. Bats

The applicant is advised that bats and their roosts are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). It is an offence to deliberately capture, injure, kill or disturb bats, or to damage or destroy a breeding site or resting place. Should bats or evidence of a roost be encountered during construction, all works must cease immediately, and a suitably licensed ecologist must be consulted. Under no circumstances should contractors attempt to handle bats. Further guidance is available from GOV.UK and the Bat Conservation Trust (www.bats.org.uk).

2. Nesting Birds

All wild birds, their nests and eggs are protected under the Wildlife and Countryside Act 1981 (as amended). It is an offence to intentionally damage or destroy an active nest or to disturb nesting birds. To avoid committing an offence, vegetation clearance, demolition and similar works should be undertaken outside the main nesting season (March to August inclusive). Where this is not possible, works should be preceded by a check for active nests by a suitably qualified ecologist. If any active nests are identified, works must cease in the immediate area until the young have fledged and the nest is no longer in use.

Biodiversity Net Gain (BNG)

The proposal is not subject to the mandatory Biodiversity Net Gain requirements, as it falls within the de minimis exemption.

If you have any further questions, please don't hesitate to contact me.

EDDC Recycling & Waste Contract Manager

02.04.2026 - This consultation has been passed onto the Waste Planning Authority (WPA).

It is noted that the WPA did not comment on the original consultation but after reviewing the reconsultation documents it is considered that Policy W4 of the Devon Waste Plan applies. Therefore, it is recommended that a condition is attached to any consent to require the submission of a Waste Audit Statement prior to the commencement of the development as stated below:

Prior to the commencement of development, a waste audit statement shall be submitted to, and approved in writing by the Local Planning Authority. This statement shall include all information outlined in the waste audit template provided in Devon County Council's Waste Management and Infrastructure Supplementary Planning Document. The following points shall be addressed in the statement:

- o Identify measures taken to avoid all waste occurring.
- o Demonstrate the provisions made for the management of any waste generated to be in accordance with the waste hierarchy.
- o The amount of construction, demolition and excavation waste in tonnes, set out by the type of material.
- o Identify targets for the re-use, recycling and recovery for each waste type from during construction, demolition and excavation, along with the methodology for auditing this waste including a monitoring scheme and corrective measures if failure to meet targets occurs.
- o The details of the waste disposal methods likely to be used, including the name and location of the waste disposal site, and justification as to why this waste cannot be managed more sustainably.

The development shall be carried out in accordance with the approved statement.

Reason: To minimise the amount of waste produced and promote sustainable methods of waste management in accordance with Policy W4 of the Devon Waste Plan and the Waste Management and Infrastructure Supplementary Planning Document. This information is required pre-commencement to ensure that all waste material is dealt with in a sustainable way from the outset of the development including any groundworks, demolition, construction and operation.

Any questions, please do not hesitate to ask.

Natural England

24.12.2025 - Thank you for your consultation on the above dated 11 December 2025 which was received by Natural England on 11 December 2025

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Designated sites Further information required - recreational pressure impacts to European Sites (habitats sites) This development site is within the zone of influence (ZoI) for recreational pressure impacts to one or more European Sites (habitats sites). Within this ZoI, proposals for any net increase in residential units will have a

likely significant effect on the qualifying features of the European Site(s) (habitats site(s)) through increased recreational pressure when considered either alone or in combination with other plans and projects.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

The proposed development has the potential to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and those Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin.

Natural England's statutory advice on these potential impacts is set out below.

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Your authority has measures in place to manage these potential impacts through a strategic solution which Natural England considers will be effective in preventing adverse impacts on the integrity of the site(s). Notwithstanding this, Natural England advises that these measures should be formally checked and confirmed by your authority, as the competent authority, via an appropriate assessment in view of the Natural England Access to Evidence - Conservation Objectives for European Sites and in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended). Providing the appropriate assessment concludes that the measures can be secured, it is likely that Natural England will be satisfied that there will be no adverse effect on the integrity of the European Site(s) (habitats site(s)) in relation to recreational disturbance. Where the proposal includes bespoke mitigation that falls outside of the strategic solution, Natural England should be consulted. Reserved Matters applications, and in some cases the discharge/removal/variation of conditions, where the permission was granted prior to the introduction of the strategic approach, should also be subject to the requirements of the Conservation of Habitats & Species Regulations 2017 (as amended) and our advice above applies.

Discretionary Advice

Natural England may provide further advice to the applicant through the discretionary advice service (DAS). Refer to Developers: get environmental advice on your planning proposals - GOV.UK (www.gov.uk) for more information.

Landscape advice

The proposed development is for a site within or close to a nationally designated landscape namely East Devon National Landscape (referred to in legislation as an Area of Outstanding Natural Beauty (AONB)).

Natural England has concluded that impacts on the nationally designated landscape and the delivery of its statutory purpose to conserve and enhance the area's natural beauty can be determined locally by the local planning authority, with advice from its landscape or planning officers, and from the relevant National Landscape Partnership or Conservation Board.

Natural England is not confirming that there would not be a significant adverse effect on landscape or visual resources or on the statutory purpose of the area, only that there are no landscape issues which, based on the information received, necessitate Natural England's involvement.

We advise that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below. Your decision should be guided by paragraph 189 and 190 of the National Planning Policy Framework, which requires great weight to be given to conserving

and enhancing landscape and scenic beauty within National Landscapes, National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering this proposal.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

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We also advise that you consult the relevant National Landscape Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the area's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the National Landscape is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose.

Furthermore, Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (which includes local authorities) in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or National Landscape (referred to in legislation as an Area of Outstanding Natural Beauty) in England, to seek to further the statutory purposes of the area. The duty applies to local planning authorities and other decision makers in preparing development plans, making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers in undertaking their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The relevant National Landscape body (Conservation Board or Partnership) may be able to offer advice in relation to the duty, including on how the proposed development aligns with and contributes to delivering the aims and objectives of the area's statutory management plan.

Impact Risk Zones for Sites of Special Scientific Interest

We strongly recommend that local planning authorities (LPAs) use Natural England's Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) (available from the Natural England Open Data Geoportal (arcgis.com) and to use on MAGIC (defra.gov.uk) along with guidance) to decide when to consult Natural England on development proposals that might affect a SSSI.

The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances. Use of the SSSI IRZs avoids the need for a formal email consultation on some development proposals, reducing unnecessary delays in the planning process. In turn this allows Natural England to concentrate resources on development proposals with the highest risks and opportunities for nature recovery.

Planning and transport authorities: get environmental advice on planning - GOV.UK (www.gov.uk) provides further guidance on when LPAs must consult Natural England on development proposals.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Annex A:

Annex A - Natural England general advice

Protected Landscapes

Paragraph 189 of the National Planning Policy Framework - GOV.UK (www.gov.uk) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the Levelling-up and Regeneration Act 2023 (legislation.gov.uk) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) - Landscape Institute for further guidance.

Biodiversity duty

Section 40 of the Natural Environment and Rural Communities Act 2006 (legislation.gov.uk) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the Complying with the biodiversity duty - GOV.UK (www.gov.uk) for further information.

Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see Habitats regulations assessments: protecting a European site - GOV.UK (www.gov.uk) and Natural England must be consulted on 'appropriate assessments' (see Appropriate assessment - GOV.UK (www.gov.uk) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the SSSI Impact Risk Zones (England) (arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified (Sites of special scientific interest: public body responsibilities - GOV.UK (www.gov.uk)).

Annex A - Natural England general advice

Air Quality

Natural England has produced 'Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site'. This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH₃), nitrogen oxides (NO, NO₂ or NO_x), nitrogen deposition, acid deposition and sulphur dioxide (SO₂).

The standing advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.

Note that this advice cannot be used to assess Nationally Significant Infrastructure Projects (NSIPs) or local plans.

Protected Species

Natural England has produced Protected species and development: advice for local planning authorities - GOV.UK (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to Wildlife licences: when you need to apply (www.gov.uk) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging Local nature recovery strategies - GOV.UK (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to Habitats and species of principal importance in England (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making. Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the Brownfield Hub - Buglife for more information and Natural England's Open Mosaic Habitat (Draft) - data.gov.uk (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Unless exempt major development (defined in the National Planning Policy Framework (publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement was extended to minor development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from May 2026.

Annex A - Natural England general advice

Biodiversity Net Gain guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the Biodiversity Net Gain Planning Practice Guidance (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to Calculate biodiversity value with the statutory biodiversity metric for more information. For minor development sites, The Small Sites Metric may be used where these sites meet the criteria to use this Small Sites Metric. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on Sites of Special Scientific Interest: managing your land

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

The Environmental Benefits from Nature Tool - Beta Test Version - JP038 (naturalengland.org.uk) may be used to identify opportunities to enhance wider

benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

Natural environment - GOV.UK (www.gov.uk) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain. Ancient woodland, ancient and veteran trees The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The Natural England Access to Evidence - Ancient woodlands Map can help to identify ancient woodland. Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk). Find open data - data.gov.uk on Agricultural Land Classification or use the information available on MAGIC (defra.gov.uk).

The Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (publishing.service.gov.uk) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to Reclaim minerals extraction and landfill sites to agriculture - GOV.UK (www.gov.uk), which provides guidance on soil protection for site restoration and aftercare. The Soils Guidance (quarrying.org) provides detailed guidance on soil handling for mineral sites.

Annex A - Natural England general advice

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to Green Infrastructure Home (naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 GI How Principles (naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

The Green Infrastructure Map (naturalengland.org.uk) and GI Mapping Analysis (naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to Find your perfect trail, and discover the land of myths and legend - National Trails for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the Natural environment - GOV.UK (www.gov.uk).

Natural England

13.04.2026 - Thank you for your consultation.

Natural England has previously requested further information on this proposal in our letter dated 24th December 2025 [NE Ref: 536262] and enclosed for your convenience.

The information is still needed by Natural England to determine the significance of impacts on designated sites. Without this information Natural England may need to object to the proposal.

Please note: We are not seeking further information on other aspects of the natural environment although we may make comments on other issues in our final response.

Please re-consult Natural England once this information has been obtained. On receipt of the information requested we will aim to provide a full response within 21 days.

SUMMARY OF NATURAL ENGLAND'S ADVICE DATED 24/12/26:

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

The proposed development has the potential to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and those Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin.

Natural England

12.05.2026 - Thank you for your consultation on the above dated 22 April 2026, which was received by Natural England on the same date.

Natural England is a non departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on East Devon Pebblebed Heaths SAC, East Devon Heaths SPA and Exe Estuary SPA. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

Natural England does not concur with your appropriate assessment because it assumes that the hotel had 100% occupancy, year round, which is not representative of real hotel operation. The average annual occupancy rates for hotels in Devon is between 64% and 70%. We request that the appropriate assessment is reconsidered with revised occupancy data.

Without this information, Natural England may need to object to the proposal.

Please re consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Additional Information required

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question.

Having considered your assessment, and the measures proposed to mitigate for any adverse effects, Natural England's advice is that your assessment is not sufficiently rigorous or robust to justify this conclusion and therefore it is not possible to ascertain that the proposal will not result in adverse effects on the integrity of the sites in question. We advise that your authority should not grant planning permission at this stage.

We advise that the following additional work on the assessment is required to enable it to be sufficiently rigorous and robust Natural England requests that the hotel occupancy rate used to calculate recreational disturbance mitigation requirements is revised. A more representative hotel occupancy figure would be between 64% and 70% (or local hotel occupancy rates for Exmouth, if East Devon District Council holds them). Natural England should be re-consulted once this additional work has been undertaken and the appropriate assessment has been revised.

Please consult us again once the information requested above, has been provided.

Natural England

27.05.2026 - NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on East Devon Pebblebed Heaths SAC, East Devon Heaths SPA and Exe Estuary SPA and has no objection. A lack of objection does not mean that there are no significant environmental impacts. Natural England advises that all environmental impacts and opportunities are fully considered and relevant local bodies are consulted.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on East Devon Pebblebed Heaths SAC, East Devon Heaths SPA and Exe Estuary SPA and has no objection. A lack of objection does not mean that there are no significant environmental impacts. Natural England advises that all environmental impacts and opportunities are fully considered and relevant local bodies are consulted.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

planning permission given.

European sites - East Devon Pebblebed Heaths SAC, East Devon Heaths SPA and Exe Estuary SPA.

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on the East Devon Pebblebed Heaths SAC, East Devon Heaths SPA and Exe Estuary SPA and has no objection to the proposed development.

Should the proposal change, please consult us again.

Environment Agency

12.05.2026 - Thank you for consulting us on the above application, received on 11/05/2026.

We have no comments to make in respect of the proposed development. This consultation is inappropriate, and we did not need to be consulted because: Outside of External consultation checklist -

If you require any additional information, or want to discuss these matters further, please contact spdc@environment-agency.gov.uk.

Environmental Health

10.04.2026 - A Construction and Environment Management Plan (CEMP) covering both the demolition and construction phases must be submitted and approved by the Local Planning Authority prior to any works commencing on site and shall be implemented and remain in place throughout the development. The CEMP shall include at least the following matters: Air Quality, Dust, Water Quality, Lighting, Noise and Vibration, Pollution Prevention and Control, and Monitoring Arrangements. Any equipment, plant, process or procedure provided or undertaken in pursuance of this development shall be operated and retained in compliance with the approved CEMP. Construction working hours shall be 8am to 6pm Monday to Friday and 8am to 1pm on Saturdays, with no working on Sundays or Bank Holidays. There shall be no burning on site and no high frequency audible reversing alarms used on the site.

Reason: To protect the amenities of existing and future residents in the vicinity of the site from noise, air, water and light pollution.

The specific noise level of any fixed plant or equipment installed and operated on the development must be designed as part of a sound mitigation scheme to operate at a level of 5dB below the sites daytime background sound level (07:00 - 23:00) expressed as LA90 1hr and night-time background sound level (23:00 - 07:00) expressed as LA90 15min, when measured or predicted at the boundary of any noise sensitive property. Any measurements and calculations shall be carried out in accordance with 'BS4142+2014 Methods for Rating and Assessing Industrial and Commercial Sound'.

Reason: To protect the amenity of local residents from noise.

Environmental Health

14.05.2026 - As per my previous comments

Environmental Health

23.12.2025 - A Construction and Environment Management Plan (CEMP) must be submitted and approved by the Local Planning Authority prior to any works commencing on site and shall be implemented and remain in place throughout the development. The CEMP shall include at least the following matters: Air Quality, Dust, Water Quality, Lighting, Noise and Vibration, Pollution Prevention and Control, and Monitoring Arrangements. Any equipment, plant, process or procedure provided or undertaken in pursuance of this development shall be operated and retained in compliance with the approved CEMP. Construction working hours shall be 8am to 6pm Monday to Friday and 8am to 1pm on Saturdays, with no working on Sundays or Bank Holidays. There shall be no burning on site and no high frequency audible reversing alarms used on the site.

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Reason: To protect the amenity of local residents from noise.

Historic England

Thank you for your letter of 1 April 2026 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

NHS Local (Eastern Locality)

15.01.2026 The GP surgeries within the catchment area that this application would affect, currently have sufficient infrastructure capacity to absorb the population increase that this potential development would generate.

However, due to the nature of the planning process, please be advised that this response from NHS Devon is a snapshot of the capacity assessment at the date of this letter. Should there be any change to this position, as a result of any current

planning applications that may or may not affect the capacity at Haldon House Surgery, Imperial Surgery, Rolle Medical Partnership - Exmouth Health Centre and Rolle Medical Partnership - Treetops Surgery being approved prior to a final decision on this development, then this will potentially initiate a further review on the NHS's position. Such factors could include but are not limited to:

- Increases in the patient list size which then exceed the practices' capacity during the period between this application being validated and prior to a planning decision
- Consideration for future 'consented or commenced' planning applications that lead to an increase in the patient list size which then exceed the existing practices' capacity during the period between this application being validated and prior to a planning decision

Therefore, at this stage, it is important to highlight the NHS reserve the right to re-assess and respond to this application at any time, as a result of any planning application(s) received and approved subsequently by the Council that will have an associated impact on the assessed GP Practice(s) linked to this application, which in turn, could have the potential to initiate an NHS contribution request in accordance to regulatory and legislative obligations.

With this in mind, whilst at this time there is no requirement for a Section 106 contribution towards NHS Primary Care from this application, as a contingency, we would recommend you take this into consideration, factoring in an estimated sum of £680 per dwelling towards NHS Primary Care to any viability assessments.

Furthermore, please note this does not reflect any operational pressures, such as workforce or patient activity levels, that might be affecting the surgery/ies and is purely based on an assessment in relation to the current premises' capacity for infrastructure only.

LPAE-Devon (Torbay+South Devon NHS Foundation Trust) Housing

06.01.2026 - Royal Devon University Healthcare NHS Foundation Trust (the Trust) has reviewed the above planning application and carefully considered the impacts that it will have on how Acute and Community healthcare services can be provided for within the local area.

The Trust acknowledges that the creation and maintenance of healthy communities is a significant material consideration and that all planning applications must be determined in accordance with the development plan (unless material considerations indicate otherwise), and that both the creation and maintenance of healthy communities is an essential component of sustainability as articulated in the Government's National Planning Policy Framework (NPPF). There have been several planning appeals whereby the Planning Inspector has ruled in favour of NHS contribution requests and confirmed that they meet the CIL test requirements, in particular we would like to draw your attention to the most recent and local appeal decision for Ikea Way in Exeter (APP/Y1110/W/21/3270745).

In addition, we understand that Council's development plans are required to conform with the NPPF and that less weight is given to policies that are not consistent with the NPPF. Consequently, local planning policies along with development management decisions also have to be formulated with a view to securing sustainable healthy communities. A fundamental part of a sustainable healthy community is access to health services and we hope that as a local partner you will

be supportive in ensuring that the local population has access to appropriate and timely healthcare provision. Whilst preparing this response, it is noted that the East Devon Local Plan and associated policies states that:

4. Providing for growth: Spatial strategy

Strategy 3 - Sustainable Development

The objective of ensuring sustainable development is central to our thinking. We interpret sustainable development in East Devon to mean that the following issues and their inter-relationships are taken fully into account when considering development: ...

c) Promoting social wellbeing - which includes providing facilities to meet people's needs such as health care, affordable housing, recreation space and village halls

55. Strategy 4 - Balanced Communities

By balanced communities we mean that in any area or neighbourhood there is a match between jobs, homes, education, and social and community facilities. Ideally these should compliment the range of ages of the resident population and have appropriate access for those with disabilities.

Key components of a balanced community include:...

b) Securing social, educational, green infrastructure and health and community facilities - these facilities play a central part in community life and new housing should help secure their provision and keep the community vibrant and viable by making financial contributions towards their provision or by providing such facilities on site where necessary.

The appendices to this request demonstrate that the Trust is currently operating at full capacity in the provision of acute, community and planned healthcare. The proposed development will create a potentially long-term impact on the Trust's ability to provide its services in a safe, accessible and sustainable manner to current and new residents.

The Trust's funding is based on the previous year's activity that it has delivered, subject to satisfying the quality requirements set down in the NHS Standard Contract. Quality requirements are linked to the on-time delivery of care and intervention and are evidenced by best clinical practice to ensure optimal outcomes for patients.

Our NHS contract is agreed annually based on the previous year's activity plus any pre-agreed additional activity for clinical services. The Trust nor its Commissioners are able to take into consideration the Council's housing land supply, potential new developments and housing trajectories when the annual contracts and funding arrangements are negotiated. The funding is not able to be changed even if the health care providers or commissioners have knowledge of new housing development through the consultation process, during the local plan process or otherwise.

Further, the following year's contract does not retrospectively pay the previous year's deficit. Therefore, new developments, whether they are allocated or windfall sites create an impact on the Trust's ability to provide the services required due to the funding gap that is created and the contribution sought is to mitigate this direct impact.

In requesting this contribution to mitigate the impact we have considered and ensured that it is compliant with the CIL Regulation 122 and Appendix G has been provided in order to assist the Local Planning Authority.

Section 106 of the Town and Country Planning Act 1990 (as amended) allows the Local Planning Authority to request that a developer contributes towards the impact

a development creates on services. The contribution of **£ 5,361** sought will go towards the gap in the funding created by each potential patient from this development. The detailed explanation and calculations are provided within the appendices.

Without the requested contribution the Trust will still provide healthcare to all the new residents of the development however its ability to support health and wellbeing for everyone, provide quality of health services for all, and ensure sustainable use of NHS resources will be compromised. In particular, the increased healthcare activity from this development without the required resources will lead to longer waiting times for all patients.

The Trust would appreciate acknowledgement of the request for an S106 contribution relating to this development and confirmation that it will form part of the S106 agreement with the developers.

Police Architectural Liaison Officer - Kris Calderhead

07.01.2026 - Thank you on behalf of Devon and Cornwall Police for the opportunity to comment on this application.

There does not appear to be any reference to designing out crime or crime prevention within the Design and Access Statement (DAS). It is therefore difficult to ascertain if consideration has been given to reducing the opportunity for crime and anti-social behaviour (ASB) and the fear of crime and ASB, as directed in both local and national planning guidance.

The site is located close to the town centre where levels of crime and ASB are higher than compared with other neighbourhoods nearby, therefore it is important that measures are imbedded into the scheme to mitigate such risk.

One aspect of the design that I cannot support as I have concerns that it will increase the risk of crime and ASB, is the open entrance to the car park, particularly with the development of an undercroft parking area. Leaving the entrance open increases the risk of casual intrusion and leaves the area, which is somewhat concealed and lacking surveillance opportunities, vulnerable to crime and ASB, particularly given the town centre location as noted above.

I appreciate that in the existing design of the site, access is unrestricted however, there is currently no undercroft parking area in place and the nature of its use as a hotel, dictates that it is managed and designated as a public / semi public space for hotel guests. Under the proposed change of use, this will be deemed a private / semi private space for the use of residents only, therefore access should be restricted.

The undercroft space is devoid of surveillance where misuse, ASB and crime such as damage, violent offences, theft, vehicle crime, drug use, sexual offences etc. would go somewhat undetected. How will these risks be negated? It would be preferable if the entrance could be gated and unauthorised access prevented.

Police Architectural Liaison Officer - Kris Calderhead

08.04.2026 - Thank you on behalf of Devon and Cornwall Police for the opportunity to comment on the revised plans of this planning application.

As alluded to previously, given the location of the site, close to the town centre where levels of crime and anti-social behaviour (ASB) are higher than compared with other neighbourhoods nearby and in order to conform with both local and national planning guidance, I'd appreciate it if the following recommendations and prospective conditions were considered and implemented where possible.

Conditions

I appreciate the inclusion of an automated security roller shutter at the entrance to the car park. This is important to restrict access to a private space which if left open, will increase the risk of crime and ASB. To support its inclusion, could the following condition please be considered?

1. Condition: An automatic roller shutter to be installed at the entrance to the car park. The shutter should be capable of being operated remotely by the driver whilst sitting in the vehicle. Shutters should be certificated to LPS 1175 SR A1+, STS 202 BR1 or equivalent.

Reason: To reduce the opportunity for crime and ASB.

2. Condition: CCTV to be installed throughout the development covering areas discussed below.

Reason: To aid in the prevention and detection of crime and disorder.

Coverage should include entrance / exit points, stairwells, lifts, landings, circulation space, lobby areas, bin and bike stores and car park, including the undercroft space.

Passport for Compliance Documents including an Operational Requirement should be in place and the following advice is given in respect of any CCTV installed:

- o Cameras, wiring and recording or monitoring equipment should be secured. CCTV should be designed in co-ordination with external lighting and landscaping.
- o The CCTV must have a recording format that is acceptable to the Police. Recorded images must be of evidential quality if intended for prosecution.
- o Any CCTV is advised to be installed to comply with the requirements of BS EN 62676:2015 Video surveillance systems for use in security applications and BS 7958:2015 CCTV management.
- o CCTV systems may have to be registered with the Information Commissioners Office (ICO) and be compliant with guidelines in respect to Data Protection and Human Rights legislation. Further information is available via www.ico.gov.uk
- o Accredited NSI or SSAIB installers must be used.

3. Condition: External lighting of the car park should meet the levels recommended by BS 5489-1:2020.

Reason: To promote safe use of the area and improve surveillance opportunities.

To supplement such lighting, walls and ceilings should have light colour finishes to maximise the effectiveness of the lighting as this will reduce the luminaires required to achieve an acceptable light level.

Further Recommendations

o Mail delivery - There are increasing crime problems associated with the delivery of post to buildings containing multiple dwellings. To reduce this risk, external residential communal doorsets must not have trades button or timed-release mechanism access as they have been proven to contribute to ASB, crime and unlawful access to communal developments.

As an alternative one of the following options should be considered:

- o A 'through-the-wall' mail delivery into secure internal letterboxes.
- o Boxes located within an 'airlock' access controlled entrance hall / lobby, whereby access can be gained by a postal worker through the outer door only.
- o External letterboxes meeting the requirements of the Door and Hardware Federation standard Technical Standard 009 (TS009).

If utility readings cannot be carried out remotely it would be preferable that they were located externally near the main entrance or in the 'airlock' space, thus again negating the need of a trades button or timed-release mechanisms.

- o Ensure communal integral bike and bin stores are fitted with security rated doorsets (e.g. PAS 24 or the equivalent) with a locking mechanism that ensures residents can not be accidentally locking in by another person. Stores should also be well-lit during hours of darkness and covered by CCTV as discussed above.
- o External doors should be illuminated with dusk till dawn lighting.
- o Signage and rule setting should be in place to promote the permitted use of the car park and the scheme as a private / semi-private space.
- o The ownership of parking spaces should be easily identifiable to reduce the potential for conflict and disputes.

South West Water

19.01.2026 CONSULTATION RESPONSE

Your ref: 25/2397/MFUL

Our ref: VV19/01/26 EX82AF

Location: The Royal Beacon The Beacon Exmouth EX8 2AF

Proposal: Change of use, associated demolitions and proposed conversion of grade II listed hotel, to 20no. 1,2 and 3 bed apartments with basement storage, associated parking and infrastructure; demolition of rear modern block to provide 2 newbuild semi-detached mews houses including integrated garages

With reference to the planning application at the above address, the applicant/agent is advised to contact South West Water if they are unable to comply with our requirements as detailed below.

Asset Protection

There are no assets within the site according to our records.

Surface Water Services

The applicant should demonstrate to your LPA that its prospective surface run-off will discharge as high up the hierarchy of drainage options as is reasonably practicable

(with evidence that the Run-off Destination Hierarchy has been addressed, and reasoning as to why any preferred disposal route is not reasonably practicable):

1. Water re-use (smart water butts, rainwater harvesting, grey flushing toilets)
2. Discharge into the ground (infiltration); or where not reasonably practicable,
3. Discharge to a surface waterbody; or where not reasonably practicable,
4. Discharge to a surface water sewer, highway drain, or another drainage system; or where not reasonably practicable,
5. Discharge to a combined sewer. (Subject to Sewerage Undertaker carrying out capacity evaluation)

Discharge to a combined sewer

Having reviewed the applicant's current information as to proposed surface water disposal for its development (domestic roof and driveway run off only), discharging to the public combined sewerage network is not an acceptable proposed method of disposal, in the absence of clear evidence to demonstrate why the preferred methods listed within the Run-off Destination Hierarchy have been discounted by the applicant.

While this is the current method for surface water disposal at the site, the proposed demolitions and remodelling should be used to provide a betterment for discharge. The removal or reduction of surface water from the combined network contributes to reduced spills and flooding events.

The applicant should consider the use of water butts, rain planters, attenuation crates and similar items to reduce the amount of surface water entering the combined network.

Water Conservation

The applicant is strongly advised to consider maximising the use of water efficiency opportunities within the design of their proposals. The current average water use in the UK is approx. 142 litres/person/day [l/p/d] (Water UK, 2020), with the South West experiencing a higher-than-average consumption rate than the rest of England. With climate change progressing with trends set to add further stress upon available water resources, SWWL would support the LPA imposing a condition requiring the optional Building Regulations requirement (G2) of 110 l/p/d for the proposed residential development.

Clean Potable Water

South West Water is able to provide clean potable water services from the existing public water main for the above proposal. The practical point of connection will be determined by the diameter of the connecting pipework being no larger than the diameter of the company's existing network.

Foul Sewerage Services

South West Water is able to provide foul sewerage services from the existing public foul or combined sewer in the vicinity of the site. The practical point of connection will be determined by the diameter of the connecting pipework being no larger than the diameter of the company's existing network.

The applicant can apply to South West Water for clarification of the point of connection for either clean potable water services and/or foul sewerage services. For more information and to download the application form, please visit our website: www.southwestwater.co.uk/building-and-development/services/pre-development-services

Informatives

South West Water response relates to surface water discharge to our network, where the discharge is from buildings and yards belonging to buildings. Where the applicant has highlighted that the surface water does not connect to South West Water network, we are not commenting on this as it is not our responsibility.

South West Water has no duty to accept land drainage runoff, flows from natural watercourses or groundwater to the public sewer system, and this is not permitted to discharge to the South West Water network. The applicant should make alternative arrangements to deal with this separately during the development and once the construction work is complete.

South West Water are not responsible for Highway Drainage and our comments do not relate to accepting any of these flows. The applicant should discuss and agree with the Highway Authority, where the highway water connects to.

If the applicant wishes to connect this development to the South West Water network, they should engage with us separately to see if we can accommodate this. No highway drainage will be permitted to be discharged to SWW foul or combined public sewer network either directly or indirectly.

If the applicant is looking to have their sewers adopted (surface and foul), they should design and construct the sewers to the current version of the Design and Construction Guidance. The process for doing this can be found on South West Water's website at [Adoption of new sewers | Building & Development | South West Water](#)

South West Water

20.04.2026 - Your ref: 25/2397/FUL

Our ref: VV20/04/26 EX82AF

Thank you for this reconsultation.

SWW have no further observations to those made in our response in January 2026.

This includes the need to consider how to reduce the amount of surface water proposed to come to the combined network.

Statement on Human Rights and Equality Issues

Human Rights Act:

The development has been assessed against the provisions of the Human Rights Act 1998, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

Equality Act:

In arriving at this recommendation, due regard has been given to the provisions of the Equality Act 2010, particularly the Public Sector Equality Duty and Section 149. The Equality Act 2010 requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. Protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race/ethnicity, religion or belief (or lack of), sex and sexual orientation.