



# The Draft Exeter Plan Consultation Autumn 2022

Exeter Civic Society Submission.

## Exeter Civic Society submission for the Draft Exeter Plan, December 2022.

We welcome this opportunity to comment on the draft outline plan. There is much that we support in it. We endorse the vision and ambitions set out in the plan. We recognise that fulfilling these ambitions are not entirely within Exeter City Council's (ECC) control. Much, for example, will depend upon whether developers come forward with suitable plans for the sites proposed.

We comment below on the individual chapters and policies in detail. Many of our comments are designed to ensure greater clarity and transparency for developers, communities and individual members of the public. Some are aimed at making the policies more robust so that they will indeed help to achieve appropriate developments. The recent announcement that housing targets will no longer be mandatory has changed the terms of the plan and made it all the more important that developments in Exeter are both needed and suitable. Some, perhaps most, of the proposed sites for development will change the character of an area. Before commenting in detail, however, we set out some general points which we would like to see reflected in the next iteration of the plan.

### General comments

**Housing Targets.** Government housing targets are a major driver of the plan. However, the recent announcement that they will no longer be mandatory should have a major impact on the next iteration of the plan. In the light of this fundamental change, we urge ECC to consider its housing needs anew in relation to both green and brown field sites, with your own calculations and justifications for whatever number you believe appropriate for Exeter, and that you consult on the proposed numbers and methodology. Simply reiterating the current targets as the plan does now would be a disservice to Exeter residents. This should include a memorandum to pause any planning for sites where loss of green field and biodiversity is likely.

**Developments surrounding Exeter.** We recognise the work being done with partner organisations including the three surrounding district councils and Devon County Council (DCC). We expect more to come from this and consider it vital to producing a coherent and credible plan. It isn't clear from some sections, for example on transport and sustainability, whether the impact of increased numbers of people living near to Exeter has, or will be, taken into account when it needs to be so. Specific attention is drawn to this in individual chapters. It would be helpful in future iterations of the plan, or Greater Exeter strategic Plan (GESP) documentation, to show how developments and plans for areas surrounding Exeter will impact the plan and have been taken into account.

**Population Changes.** It would be helpful to give context to the plan to include details of how Exeter's population has changed and is expected to change, and the impact it will have on employment, education, services and transport. It should include an estimate of likely changes in student numbers and the level of accommodation needed for them. This will help to show the challenges faced and the degree of change required – for example on use of cars. It is also fundamental in considering and justifying future housing needs. Currently the only significant numbers in the plan relate to housing units as determined by the government but these numbers are no longer mandatory. People should come before units.

**Communities.** Together with the local community and other community groups, we have prepared a *Prospectus for the Redevelopment of the Wider Water Lane Area*. We are submitting this as part of our response to the draft outline plan. It has relevance for the detail of some of the chapters and policies in the plan and should be read in that context. However, its first three and perhaps most important recommendations include the following:

*'The Wider Water Lane Area needs collaboration in a unitary planning approach for the whole area [...]. The aim is to create a positive legacy for Exeter in the 21<sup>st</sup> century. This can only be achieved by keeping different interests transparent and bringing them together in a meaningful exchange. Residents, developers, Exeter City Council, and Devon County Council need to provide a forum which provides local insight and works towards mutually agreeable plan.'*

This is relevant to developing and executing the draft outline plan. Many of the sites proposed for development will involve significant change for the local community who are already living, working and shopping there. Successful development will fully engage the local community at the earliest stage. More could be done in the plan to achieve this and give communities a clear role in shaping and determining plans, and we hope the council's Statement of Community Involvement will be fully realised. This would be fully in line with the Secretary of State for the Environment's recent statements on planning reform.

**Brownfield sites.** We support the move to concentrate development on brownfield sites. However, we think it should be made clearer what this might entail. The glossary gives a helpful definition, making clear that brownfield sites refer to previously developed sites, not derelict ones. But this means that many of the sites already have buildings upon them, including homes and important retail and employment facilities. For example, the West Gate Site is currently mainly retail and office accommodation, as well as St Thomas' station; and the East Gate Site includes much existing housing and independent retail accommodation. Marsh Barton of course is already substantially occupied by employment buildings. The Council and the plan need to be clearer on what is intended and the actual scope for building on these sites. This is also relevant to our next point.

**Densities.** We recognise that there will be different densities according to the location of the site and its intended development and that it is not possible to give a definitive answer to what an 'optimal density' should be. We also recognise that sites in or near the city centre will have higher densities than those further out. However, there can be no justification for densities in Exeter which would be similar or close to those of central London or Manchester which are major metropolises. To do so would wholly change the character of the city rather than be in keeping with it. There must be guidance on acceptable and recommended densities. LDA Design's Exeter Density Study from 9.7.2021 provides potential Exeter specific guidance, though in its recommendations it focusses on optimising densities across the city and presenting a minimum density plan, rather than providing maximum density numbers for the different sites. In stating that the highest densities should be close to the city centre, the Exeter Plan needs to declare preferred densities to guide developers on what is acceptable, and provide clearer guidance on acceptable densities in suburban areas. Densities for the planning process are often laid out in a local Design Code. We wonder whether there need to be a general one for Exeter to be developed, rather than focussing on Design Guidance for each of the individual developments. One danger of the latter approach is that these specific ones might simply come too late and only when potential developers are already engaged.

**Design Code.** There is frequent reference in the document to 'beautiful' and 'high quality' buildings and other design features. There is also reference to the Exeter Design Quality Partnership and later specifically to a design code. We strongly support such a code, would want to contribute to it and urge that the work is undertaken so that it can apply from the start of the planning period. The code would also for example provide an opportunity to commit to buildings being carbon neutral (see below), address the need for use of 'grey' water and set out minimum size and facility requirements for co-living accommodation (which is not referenced in the plan but has become an increasing feature of new developments and planning applications).

**Net Zero.** We strongly endorse the commitment of Exeter to being carbon neutral by 2030. We welcome the use of *Passivhaus* standards in St Sidwell's Point and Exeter City Living's commitment to them. The National Planning Policy Framework allows councils to set higher energy efficiency standards than mandated by central government, now or in the future. Exeter should do this to ensure all new development is zero carbon. We therefore urge the city to go further in setting standards for achieving net zero. For example, *Passivhaus* buildings can (and are) still being fitted with gas boilers for water heating and back up. They also do not require any on-site electricity generation, essential for meeting net zero. We understand Reading

Council has adopted a plan involving no combustion of fossil fuel materials on site unless required for industrial purposes that cannot be fuelled in other ways. We urge the council to adopt a similar policy of no carbon emissions once built.

We also suggest that it more explicitly adopts the Royal Institute of Chartered Surveyors *Whole Life Carbon Methodology* published in 2017 which addresses the carbon emitting consequences of demolishing existing buildings in order to build new ones – a potential aspect of many of the brownfield sites provisionally selected for possible development. Adopting these approaches and the detailed suggestions made about individual chapters and policies would take the City much further towards the net zero targets.

**Biodiversity.** We fully support ECC's drive for greater biodiversity and the net gains on or off site will be demanded of developments. It would be helpful to know how this will be achieved for brownfield sites and for greenfield sites where there is likely to be a reduction in biodiversity following development. This should be set out in the next iteration of the plan, either in the plan itself or in supporting documents.

**Glossary.** The Glossary is very helpful, but very much hidden away under the FAQ section. The reader would be further helped by having a cross reference to it at least the first time a term explained in the Glossary is mentioned in the text. Otherwise phrases like 'park and change' and 'soft landing packages' are unintelligible and leave the reader baffled.

**Supporting Documents.** The Exeter Plan cites many supporting documents, ECC strategies and plans, and references to government legislation and guidance. With documents such as this plan being increasingly electronically based, it is essential that electronic links are provided to all additional information cited in the plan.

We now address the individual chapters and policies in detail.

## 2 This is our city, this is our future

We recognise that this chapter is intended to be forward looking and endorse much that is said. But we think it important that due reference is made here to the core characteristics of Exeter that make it so attractive now: the access to greenspace in and around the city; the views to green hills in many directions from many points in the city; the (current) compact nature of the city; the many historic buildings in and around Exeter; and the estuary and canal and its wildlife. These are all mentioned in different chapters as important features to retain and enhance so should be brought into the overview of the future.

Where the Exeter Vision 2040 defines its seven key outcomes (2.5.), the ambitions behind these outcomes should be explained further, in particular, metrics and goals need to be defined quantitatively so progress can be measured meaningfully.

It has to be made clearer that the Liveable Exeter Place Board as 'critical friend and challenging partner' is an unelected, voluntary (pressure) group. This is of particular significance as the Place Board is seen as enabling 'collaboration between the city's anchor institutions, subregional partners and the Government in delivering Liveable Exeter'. The community representation on the Place Board is limited, and therefore additional mechanisms to ensure a wider community involvement need to be found.

The Exeter Development Fund as a publically owned infrastructure and development fund at city level, is an innovative idea with welcome aims (as defined in 2.21), but it needs clarification as to who is in ultimate control. A recent article in the *Exeter Observer* (August 22, <https://exeterobserver.org/2022/08/04/exeter-development-fund-rent-extraction-unaffordable-housing-gentrification-not-net-zero-exeter-city-futures-private-debt-liveable-exeter-financing-scheme-insufficient-evidence-assumptions-housing-needs/>) raises serious questions which need urgent answers.

### 3 Spatial strategy

#### Spatial strategy: An explanation

We would like to see an explicit policy and delineation on a map of “green hill” areas that must not be built upon or sight lines to them obscured, with a clear statement that this policy is an overriding priority when assessing plans for development. A similar map and requirements should apply to the Valley Parks, canal, river and estuary.

Similarly it would be helpful if there was an overarching map which shows the different policies and factors governing the areas within the city – e.g. development land, employment land, protected landscape, flood risk areas – much as East Devon has done in their recently published draft plan.

#### **Policy S1 Spatial strategy**

We largely support the principles set out in S1. But, it is not clear to us whether this is intended to be a set of criteria which has guided the development of the Spatial Strategy or a set to guide developers. It seems to be a mixture of the two.

We would wish to understand more about how the criteria work. Are the individual points obligatory, or is it enough to meet a few of them? Will a proposal “be supported” if it meets all 10 criteria or only one or two? We think there are some crucial ones which need to be made obligatory to give this the bite it needs e.g. 1,2,3,6,7,9,10.

There should be an explicit reference to support being conditional on compliance with other policies in the plan (e.g. on design).

1. This would be an opportunity to define ‘good quality’ in relation to the Design Code. (See above).
2. While new forms of employment might be preferred, would it be fair to rule out developments that brought forward or maintained existing forms of employment for example retail, hospitality and culture?
3. This reads as if the transport hubs have to have good access to green infrastructure. Is that the case or is ‘good access to green infrastructure’ additional to the other factors listed? (If the latter a comma after ‘hubs’ would help.)
4. This should be expanded to become a specific “windfall” sites policy, indicating that the first choice for such sites is housing for the public.
5. ‘Modest’ should be clarified. Also it isn’t clear as drafted whether “supplement” means an attachment to a brownfield development (i.e. something which overflows the brownfield site) or something completely free-standing. The point might also be interpreted as guidance for the council rather than developer.
6. This policy should *preclude* development on such sites with a clear statement of priority over other policies, including “viability”. It should also include sight lines where appropriate. (See our first paragraph on Spatial Strategy.)
7. This is surely not compliant with Environment Agency policy. Policy CE3 is better. Does the city council need to attach a Flood Alleviation Strategy to the local plan in partnership with DCC? Many of the Liveable Exeter sites are west of the river and in flood zones, although the protection from the recent flood defence works are recognised.
8. As drafted it seems to duplicate Point 3 or is otherwise obscure.
9. See our earlier comments on densities. This could be higher up the list and could include a specific reference to ‘no or low car use’ as it would be possible to maximise walking and cycling and still have extensive car use.
10. We look forward to quantitative assessments of the education, health etc. needs of new developments, and how they will be provided.

#### Liveable Exeter principles

We support the aspiration in this section to develop master plans and design codes. However, the council must find the resources to follow through on this before any part of a major site comes forward to ensure all

owners of land contribute towards aspirations for an area and the infrastructure needed, making contributions through the Community Infrastructure Levy or Section 106 contributions.

**Policy S2: Liveable Exeter delivery principles**

We read with interest that a masterplan be made a prerequisite for all large-scale development proposals, and that it should cover the wider site area (exactly what we argue in our 'Prospectus for the Wider Water Lane Area'). All six principles make very good sense.

However the Introduction for this policy as drafted only works when one developer has acquired all the land for a wider area. It seems unreasonable for a planning applicant for part of an area to have to prepare a master plan for a wider area, particularly if other landowners do not cooperate or share the same vision. Master Plans must be developed by the planning authority with consultation with the local community, statutory authorities, and interest groups.

Policy S2 is about large-scale brownfield sites. We would like to see an additional policy which will guide smaller development sites that may come forward as windfall sites across the city towards being used for public housing. We consider these too should follow the Liveable Exeter principles.

**Principle 1**

Existing views across the city from within the city should be explicitly protected, not just new ones created.

**Principle 2**

Although entitled 'Outstanding Quality' none of the points relate directly to it in terms of the buildings – 'quality' doesn't appear in any of the bullet points. It should be renamed.

The first bullet invites developers to build high(er), as evidenced by recent proposed developments in Haven Banks and Water Lane. New buildings should complement and not overpower or dominate existing ones, particularly when there are heritage assets. They should also complement and blend with existing neighbourhoods and not be regarded as entirely separate entities.

The idea to incorporate stewardship measures for the new developments to provide the effective management and maintenance of the public realm and communal private spaces, is a very important one and most welcome, as it is necessary to build for lifelong developments; not having stewardship measures in place can lead to neglected sites (e.g. this article on how co-living turned into a nightmare, <https://www.vice.com › en › article › epzdk › co-living-london-nightmare> )

**Principle 3**

Will the proportion of homes to be "affordable" be restated? Will it be 35% again? Is there scope to increase this? Social housing should also be referenced.

The second half of the second bullet implies that the development will provide 'education and skills'. It may enable these to be provided but will not in itself provide them.

**Principle 4**

Keeping homes adaptable to changing demands and life styles is an important principle. But what does this mean in concrete and how can it be achieved?

'Include beautiful buildings.....' suggests only some buildings within a development have to have these characteristics, surely all should. 'Beautiful' also needs to have some test and not left to the eye of the developer or planning officer. The proposed design code would help here, involving the local community in deciding what constitutes beauty.

It is here that a requirement for all new building to be net-zero in terms of annual carbon emissions could be placed, including no combustion of fossil fuels on site. Reading Borough Council's adopted local plan has this provision; [see this case study](#) explaining how it was achieved. There could be a specific requirement for all new homes to be fitted with solar panels.

There should be reference to efficient water use as well as energy use (e.g. more re-use of grey water).

#### Principle 5

A statement that developments should be permeable for people walking and cycling on all possible sides of the boundary would be welcome.

A suggested minimum standard for secure cycle storage would be one space per bedroom, on the ground floor, opening directly onto the building access, and taking account of the wide range of cargo and trailers that can be fitted to bikes to support car free travel.

- Principle 6

We would welcome a stronger statement to protect and enhance biodiversity. For example, native planting should be required, no net loss of trees, priority given to retaining mature trees (including a requirement to demonstrate that development would be unviable unless they are not retained).

## 4 Climate change

### Net zero Exeter

We think the reader would be helped by providing links to Exeter's Climate Emergency decision and the Exeter Net Zero 2030 documents. So too with links to the Government's 'Future Homes Standard' and 'Future Building Standard' for non-domestic buildings.

We note that the council will keep the Government's progress in achieving the standards in these documents under review and will set its own if necessary. We suggest that it should do so now and require all new homes and other developments to be carbon neutral. This is already a part of [Reading Borough Council's adopted local plan](#) which received little resistance at draft and inspection stage.

'Biomass energy from organic matter' is listed as a 'renewable source of energy': this must not include wood chip, as recent research shows that this is not helping towards zero carbon, more likely the opposite.

It is also debatable if 'energy from waste' is truly renewable as we move towards a circular economy. A circular economy will mean that there is little or no waste to burn.

#### Policy CE1: Net zero Exeter

We suggest that the introductory sentence make it clear that developments will support the achievement of net zero 'through each of the following'.

The fourth bullet should be more ambitious and rule out all carbon energy emissions. The government and the National Grid expect electricity to be zero-carbon for periods from 2025, and zero-carbon at all times from 2035. Combined with heat pumps, this will enable zero-carbon heating.

A bullet point should be added requiring electric charging points and any other external infrastructure necessary for achieving net zero.

### Local energy networks

Local energy networks (LEN) are not zero carbon unless the heat sources are large heat pumps. Exeter must not fall into the trap of allowing combined heat and power (burning fossil gas) or energy from waste (releasing large amounts of carbon) as being framed as "low carbon". We must avoid building what will become "stranded assets", requiring decarbonisation in the medium-term.

Heat networks are outside Ofgem price controls and were not supported by the government in recent energy price support policies. These may be short term issues but cannot be guaranteed to be satisfactorily resolved for the future.

We believe the 'only' 30% figure for power generation efficiency is incorrect. Combined-cycle gas turbines are approximately 50% efficient; coal power, at 33% efficiency, is no longer routinely used; and "efficiency" has no meaning for wind and solar power.

Local Energy Network buildings can be unattractive, and can take up a lot of land, but there is no mention of how they will be integrated into developments. Do they need to be stand-alone buildings because of any risk of explosion or fire? If so this should be clarified, and perhaps plans included of where they may be located.

We understand how LENs can be put in place in large new developments such as Cranbrook and Monkerton/Hill Barton, where they were developed in tandem, but we are sceptical about whether they can

be superimposed on already densely-developed areas such as the City Centre, Heavitree, Wonford and St Thomas.

Under current planning guidance, new zero-carbon renewable energy schemes require allocation of land to be identified for that purpose in local plans. We would urge ECC to follow [the lead of Stroud Council](#) and commission a study to identify suitable locations for inclusion in the local plan.

Some guidance into who is supposed to plan, build, finance and run LENs needs to be part of the Exeter Plan.

### **Flood risk**

The pressure of South West Water's sewage system, and corresponding increase in sewer overflow discharge events, should be recognised. Rain gardens and other methods of reducing rapid rainwater run-off should be incorporated into new developments.

The section concerning flood risk is not very helpful. Whilst it sets out concerns about development on flood zone 3 it is important that a plan is included showing the affected area. It is clear from the Environment Agency's response to the Haven Banks planning application that safety and evacuation plans are needed. Does DCC as the lead flood authority have a plan for the area, and if not, should they not be preparing one to support development in the Water Lane and Marsh Barton areas? Whilst new homes may be built with higher ground floors, what is the strategy to support the many homes that exist in the area with living spaces at street level?

### **Policy CE3: Flood risk**

We are unclear as to what "In areas at risk of flooding" means. We think 'areas at risk of flooding' could for clarity use the standard definition of Zones 2 and/or 3. Where the policy says that 'all development proposals must mitigate against flood risk by utilising SuDS unless there is clear evidence that this would be inappropriate', more explicit detail is needed on what clear evidence means and the bar for 'not appropriate' need to be set high.

## **5 Homes**

This chapter is the central feature of what any Local Plan aims to achieve. The current version is very light on detail and provides little guide to what the public might expect in the future and how different sections of the city's population might be accommodated. Government targets which underlie this section and much of the plan need to be reviewed in light of the recent announcement that they are no longer mandatory. We consider that future iterations of the plan need to be greatly strengthened by explicit assessment of:

1. The detailed working underlying the 650 homes per year target (particularly in light of the recent announcement that the targets will not be mandatory) and a view on the mix of housing that will be required for different demographics within the overall population growth.
2. The need for social housing, housing for older people, disabled people, or those with additional needs. With an ageing population it is essential that a reasonable percentage of new homes are built for older people, included assisted housing and care homes. Reading's local plan for example includes specific targets for including disabled-accessible homes in new developments.
3. The number or percentage of 'affordable' new homes.
4. Student numbers and the need for further purpose-built student accommodation (PBSA) alongside the implications for 'ordinary' homes occupied by students. From evidence obtained from the council's forward planning team, it is clear that PBSA and Co-living accommodation is included in the housing completions since April 2020, with some planning applications yet to be signed off. This should be clarified here, or links provided to where the information can be found. The method of counting and including student accommodation should be made explicit in the Plan.
5. The division of existing buildings to create more homes with a policy to support and control this. This should apply to both existing residential buildings as conversions can dramatically change the nature and character of an area and office accommodation where owners currently have development rights to convert such buildings into residential homes. There is a possibility that many upper floors above retail buildings in the city centre will not continue to be used as offices, and their conversion



to homes will support the council's aims to have more people living in the city centre to add to its vibrancy.

6. Co-living is a type of housing which developers and the council seems to favour. In this regard, it is essential that the council publishes guidance for the size of rooms and the level of support accommodation needed per person, as well as supported accommodation such as cycle storage space.
7. A design guide (a good version of which already exists) with recommendations about the size of homes, living space, outside space, parking and travel arrangements etc.

### **Policies H1 and H2**

We cannot see that these are policies. Content will have to be reframed to convert the lists into policies. The figures in H1 need to be further justified as government targets will no longer be mandatory.

### **Policy H2: Housing allocations**

We comment separately on the proposed sites at the end of this document. However, we see significant challenges in developing the major brownfield sites as some of these have extensive buildings in use which (the creative industries will need to be converted or more likely demolished.

The provision of sites for Gypsies has been part of the council's Local Plan for over a decade now but suitable sites have not been provided. It would be helpful to know where such sites will be provided under this plan.

## **6 Economy and jobs**

We think this chapter is too one-dimensional on the knowledge economy and education as 'transformational sectors'. We recognise that the employment study recommends that policy should support their development. But it also notes (para 2.2.6) that other sectors such as wholesale and retail, manufacturing, arts and entertainment) and financial and insurance activities are very important to Exeter's economy and should be supported in addition to the 'transformational' sectors. These sectors and existing businesses outside of the knowledge economy are ignored and will not feel acknowledged or even supported in this vision of Exeter's future economy. Some numbers showing the relative size and strength of different sectors would be helpful as well as analysis of their potential. For example, some of the bigger, already established, businesses, like car repairs and servicing, might be of less importance in the future, but it would be worth analysing their potential for skilled employment in Exeter.

Will there be room in Exeter for innovative and green jobs in the secondary (manufacturing) sector?

- With rare earths mining potential in Cornwall and some parts of wider South-West, is it worth considering establishing battery production in Exeter with Exeter being a main transport hub in the South-West and from there for the rest of the country.
- There is market potential to be investigated for local solar panel and wind turbine as well as tidal turbine production.

There is no mention of providing land for new jobs for the new residents who will occupy the 14,300 homes planned. Typically each household will require at least one job, and not all of these will be office based and have an opportunity to work from home or at work hubs. There must be recognition that land and buildings will be needed for building contractors, plumbers, and other trades people who represent a significant percentage of the employment sector.

### **Policy EJ1: Economic Growth in the transformational sector**

This has to be self-explanatory to the public as well as being useable for professionals while being incapable of wily interpretation. This policy implies that developments which support other areas of employment will not be supported as there is no reference to these in any other policy or in the introductory paragraphs. – is that intended?

### **Policy EJ2: Retention of employment land**

We object to the inclusion of the whole of Southernhay as Employment land. Although Southernhay Gardens, Broadwalk House and some parts of Southernhay do fit this definition, the C18/C19 former houses of Southernhay West and East do not and are very suitable for residential use above and offices/consulting rooms/estate agents etc. on the ground and lower ground floors. Dean Clarke House in Southernhay is a prime example of an 'employment' building converted to housing units. Is it intended that that should change? We believe that Marsh Barton must be included in this policy because of the high number of jobs located there.

### **Policy EJ3: New forms of employment provision**

The policies make no mention of the technical infrastructure to support the different forms of working. This may be elsewhere but for coherence should be included here along with any other requirements.

### **Policy EJ4: Access to jobs and skills**

We cannot see how these policies can be enforced without the developers having firm commitments from employers and skills etc. at the time of the planning application.

## **7 The future of our high streets**

The council leader has said publicly that the city centre should have more pedestrianised streets and that this would add to it as a 'destination'. We think this will greatly enhance the centre, and if it is an ambition, it should be stated as an important part of the plan which would guide development.

Development in the centre - along the High Street, Fore Street and North and South Street - needs to complement the significant architectural heritage, including the 1950s High Street architecture. These points should be reflected in the policy.

Sidwell St is included as a 'local centre' but it is part of the city centre (as recognised at 2a on page 36), not a "local centre" and it is questionable whether Blackboy Road and Mount Pleasant qualify as local centres, as there is only a very limited number of shops and services at the lower end of Blackboy Road and a few more at the Pinhoe Road end (here called 'Mount Pleasant').

We support the ban on new large out of town retail developments and we hope the council has a retail strategy to discourage this. However, the existing ones (Tesco retail park, Stone Lane in Marsh Barton, Sainsbury's on Pinhoe Road and now Aldi and Lidl) are in the process of becoming local centres. Greater thought needs to be given to how they could be developed with smaller retail and hospitality outlets, and less focus on cars in their central spaces, and so improving as local centres. They should not be excluded from the plan and ignored as they are in the Draft Exeter Plan. They enable local people to have local services through active travel, rather than travelling into the city centre.

There is much mention of increasing the night time economy but no mention of developing a new larger Theatre or performance venue which we know the council has investigated after pressure from 'The Theatre for Exeter Group'. Whilst such a venture will be financially challenging, it has been demonstrated that the large number of people attending evening performances brings significant revenue for local businesses. With the city centre being well connected to rail and bus services, fewer people may use their cars than those travelling to the isolated Northcott Theatre.

There are hints about other cultural provision to attract visitors – these should be spelled out to encourage the arts and developers.

There is no mention of the proposed district centre off Honiton Road which is part of your own Master Plan for the area. This should be highlighted because it will provide services for people living in new homes currently being built in that area.

### **Policy HS1: The vitality of our high streets**

Despite the heading, this is not just about High Streets. If it were, it would not be supporting development in local centres, which will draw business away from High Streets.

The last line should read large scale retail proposals outside of the city centre, district centres and local centres will **no longer** be permitted.

The policy should stress the importance of developing services and facilities to minimise travel across the city (as in policy STC1). A range of policies should be developed to reflect each of the sections – City Centre; District Centres; Out of Centre Retail.

## 8 Sustainable transport and communications

### **Sustainable movement**

We support the ambitions in this chapter to reduce the number of journeys by car and for more people to use active travel, but a major difficulty in addressing congestion and air pollution in the city is reducing the number of people traveling from outside Exeter for work, retail and leisure – estimated to be 34,000 a day according to the 2011 census. This means creating better incentives to use public transport or leave your car outside the city and use public transport into the city, daytime and evenings.

A strategy is needed on how to enable built-up parts of Exeter to become low-car communities, including the measures, incentives and, timescale for change.

Greater clarity on who carries responsibility for the various strategies involving local partners and when the named strategies and plans are expected would be helpful.

#### **Policy STC1: Sustainable movement**

(3) The reference to the transport hierarchy is confusing as other aspects of the hierarchy are covered in the following sub paragraphs. Use the contents under 8.3 to explain the hierarchy. It will be necessary for all new development to make financial contributions towards off-site infrastructure to ensure that cost is spread across developments, especially from smaller developments. We hope the emerging Infrastructure Plan will identify such infrastructure.

(4) It would give this some added strength and support policy HS1 by adding at the end: “, including late evening services.”

(6) An example or two would help add clarity and make it more concrete. Use the details of 8.6.

### **Transport and new developments**

#### **Policy STC2: Active and sustainable travel in new developments**

The requirement for access to electric vehicle charging points should be strengthened. It should apply to all developments, not just ‘major’ ones and should be more specific - rather than simply requiring access, a ratio of charging points to houses should be specified e.g. One charging point per house. (Should conversions be covered in this as well as developments as many planning applications are for small scale changes of use into accommodation?).

“In sequential order” needs greater definition. If 2 follows 1 what are the people who need to rely on public transport expected to do while they wait? The lessons of Freiburg in Germany were to get the public transport in very early.

(2a) We do not see that ‘ensuring densities’ is a relevant part of this policy.

There is no mention of support for people with disabilities who may need specific transport facilities.

#### **Active travel proposals**

We would like to see here ambitions for pedestrianisation of the City Centre. It should refer to removing cars and car parking, and other vehicles rather than reducing the dominance of cars.

We would like to see DCC’s aspiration to raise the draught under the A379 swing bridges when they are replaced included here. This will improve pedestrian and cycle access to the south allowing travel under the bridges if the scheme is successful, and reducing disruption to vehicles on the A379, which is a secondary national route.

#### **Policy STC3: Active travel proposals**

(5) Add “Protecting and” at the beginning.

To support active travel it is necessary to widen many of the narrow pavements and inappropriate shared cycle paths in the city. This should be noted, and development should be expected to contribute towards such works. It will be necessary for DCC to identify improvements and changes in the LCWIP.

### **Public transport**

We do not consider that we currently have an 'efficient' bus service – new wording is needed.

The Exeter Plan will exist well beyond the completion of Marsh Barton station so the actual completion date should be given. Any other new stations should also be explicitly referenced.

#### **Policy STC 4: Public transport proposals**

(1) There needs to be an overarching reference to better reliability and frequency of service as part of enhancement.

(1i) The Glossary notes that "park and change" means change to another means of conveyance e.g. folding bicycle/scooter/ friend's car. but it would help the reader if this was spelt out here as well.

(2a) Should this be Hill Barton, not Monkerton? And does Network Rail still support this?

(2c) Improving the interchange facilities at St David's station seems at odds with the stated ambitions for the Red Cow development area in the Homes section. It isn't mentioned there as a development requirement (and certainly doesn't feature in the 'slider' presentation).

(2d) Is it credible that disabled access will be provided to elevated stations such as Polsloe Bridge, and then to be able to access a train?

(5) Does this mean contribute "financially"? If not, what does it mean?

There should be a proposal to extend bus services into new development areas.

### **Digital Communications**

#### **Policy STC5 : Digital communications**

The requirements for digital infrastructure should apply to all developments, not just major ones, and conversions as for STC2.

#### **Other**

We think there should be a section and policy relating to commercial delivery vehicles. In the council's Net Zero Exeter 2030 there is a desire to introduce a 'last mile' delivery system, particularly to the city centre to stop the use of articulated vehicles entering the city centre. Delivery vehicles are a critical part of commerce, but emit significant levels of pollutants. In addition, there has been a significant increase in small/courier vans delivering goods ordered from on-line companies. Could these deliveries be made by electric vehicle or cargo bikes? Include plans for Delivery Hubs, as outlined in the Civic Society's *Prospectus for the Redevelopment of the Wider Water Lane Area* (Chapter 3.1).

Is it possible to expect all registered taxis to be all electric and for appropriate charging infrastructure provided across the city?

Should there be a policy to encourage and support changes to car-ownership in the already built-up areas of the city? What is said in terms of adapting roads and increasing public transport would all feed into such a policy as well to stir long-time residents into the new direction. The concept of a low-car usage policy for the whole of Exeter with more Co-car provision could be introduced.

## **9 Natural environment**

### **Policy NE1: Landscape setting areas**

We consider policy NE1 to be helpful in the context of the National Planning Policy Framework (NPPF), but needs further input to become sufficiently robust to deter development. The third paragraph provides a wide loophole for development and should be strengthened.

Exeter does not have a good track record in protecting the City's landscape assets. Previous plan policies included inter alia, The "Strategic Gap" between Exeter and Topsham - lost, St Bridget's Nurseries (Grade 1 agricultural land) - lost, Land south of Gypsy Hill (Grade 1 agricultural land) - lost.

### **Policy NE2: Valley parks**

Access to public open space should be **more important than** wildlife protection except, of course, in regard to internationally or nationally protected or endangered species. Why not apply this to all developments? There is to be a new park at Northbrook. All Design and Access statements, accompanying planning applications, will be required to demonstrate access to the Valley Parks. The Civic Society welcomes the partnership with Devon Wildlife Trust but, given that the Valley Parks duplicate, and are part of, the multi-functional "Green Infrastructure" (Policy NE4), there should be some management criteria to ensure that public access for informal/active recreation is not considered secondary to wild life protection other than for internationally or nationally protected or endangered species.

### **Policy NE3: Biodiversity**

A 10% net gain in biodiversity either on site or off site is supported but further information must be included either in this policy or in the commentary to demonstrate where or how this can be achieved for the large brownfield sites proposed for development. Perhaps this will be clarified on the proposals map, or in the updated HRA. The restriction on developments affecting other known areas of biodiversity should be strengthened. They would need to demonstrate that they are essential and that the benefits clearly and demonstrably significantly outweigh any adverse impacts.

### **Policy NE4: Green infrastructure**

There should be no diminution of the area/extent of Green Infrastructure as a consequence of future development. What is meant by large scale developments? This should be clarified, and why not all developments, except the very smallest?

For example, if sites such as **Bonhay Meadows** remain under threat of development, then their collective contribution to Exeter's Green Infrastructure will be lost. The Green Infrastructure Strategy should be part of the Exeter Plan and an assessment of the extent of publicly accessible Green Infrastructure together with policies to protect and manage it.

This policy/initiative originated in the early 2000's and is carried forward from earlier local plans. It relates to the provision and management of multifunctional green spaces in public or private ownership. We would like to see quantitative requirement for green space provision per household, particularly for play areas. It is noted that the provision of green space generally, in recent planning applications, has been very low. We are surprised that the Clyst Valley Park is not mentioned as a SANGS site. It is an emerging publicly accessible area for recreation for residents of East Devon and Exeter.

## **10 History and heritage**

We welcome the inclusion of history and heritage assets and the protection offered by the policy. We particularly welcome the inclusion of the asset's setting. New buildings which dominate or overpower a heritage asset rob the asset of an important feature.

However, we consider that the section and policy could be more ambitious. As it stands, it is disappointing. Exeter is one of the most significant older settlements in the country with many fine buildings that survived World War 2 bombings, but this is not celebrated sufficiently here. Local historians increasingly refer to the exciting mix of buildings of different periods as a feature where Exeter's heritage can be experienced in the present day.

We cannot agree that the current proposals match the opportunity provided by the Plan to protect and enhance Exeter's historic assets.

The section on 'Heritage assets and future change' highlights that there are significant nationally important monuments etc. in the city centre, but it should strengthen the expectation that those responsible for such buildings and structures will be held to account for their maintenance and preservation. There are currently three historic assets on 'English Heritage's at Risk' register.

### **Policy HH1. Conserving and enhancing heritage assets**

The paragraphs should be numbered (as in other policies of the draft plan) to help the reader.

The first sentence needs qualifying with something like “Development proposals with potential heritage impacts...” As drafted it would apply to Marsh Barton. It also says that developments should ‘protect and enhance’ any heritage assets which we would be in favour of, although the relevant legislation says ‘preserve or enhance’. Perhaps it would be possible to say ‘protect and where appropriate enhance the city’s rich heritage’

We welcome the specific reference to the City Walls in the second paragraph. These are indeed a precious and irreplaceable feature of Exeter. However, other assets also require similar emphasis, notably the Cathedral, its Close, the Bishop’s Palace and Gatehouse. Their setting and sight lines from other areas of the City need to be protected. For example, the view from the Riverside Valley Park to the cathedral is an iconic feature of Exeter.

The policy should include a wider understanding of assets worth protecting in the context of new developments, e.g. the Iron Bridge (as 19<sup>th</sup>-century heritage) and the post-war High Street ensemble of buildings. So too the Quay and canal basin and indeed the canal itself as one of the first, if not the first, English shipping canals. The same sensitivity that is given to the City Walls should be explicitly applied to these features.

In respect of the third point, we are not sure that the council has the power to ‘require’ works to minimise carbon emissions. We believe you can only ‘encourage’ this through building regulations.

The fifth paragraph refers to ‘buried remains’ amongst other things. We are aware that there is a register of buried remains but more should be done to make this accessible to the public and developers alike.

The sixth paragraph says ‘Where it is not practicable or desirable to retain heritage assets in an unaltered form...’ Clarity should be given on who decides it is impracticable or desirable. Is this simply an assertion by the developer, which would be unsatisfactory, or one made by the Council?

The policy should also require that where only recording of an historical feature is practicable the subsequent report or results must be made publicly available on line and in hard copy in a community resource.

The policy should also specifically ensure that developments involving buildings with blue and other commemorative plaques preserve or enhance the plaques in situ. Such plaques draw attention to notable local individuals or events, making the building significant even if it is not a designated heritage asset. They exemplify Exeter’s history and add to its culture. Such plaques are often suggested by the local community so are a direct expression of local feeling and inclusion.

## **11 Culture and tourism**

We welcome the vision and objective to promote culture and embed it in the city’s growth and development. It is important to define cultural richness by acknowledging a multi-faceted broad concept of culture. Public spaces contribute to this as they provide focal points to encourage pride of place and their value needs to be recognised in the policy.

We welcome the references to existing projects such as Creative Arc, Artwork Exeter and Exeter Civic University Agreement. Links should be provided to them in the next version of the Plan. Will the Public Arts Strategy which ECC is developing be available for the next iteration of the Plan and a link provided to it?

We note that there is no reference here or elsewhere to the emerging Sports Strategy. We think this would be the place to include it in the plan given the references to Exeter City FC and Exeter Chiefs and to include a link. And we think proposals to redevelop the Wonford Sports facilities, and develop new sports facilities and a swimming pool at the Isca Centre should also be noted, especially as they could impact on green and sports’ spaces.

The opening sentence of 11.3 – ‘Heritage, sport, art, music and religion’ should have ‘literature’ added, particularly given Exeter’s status.

Public Art (11.7) should relate to Exeter unless it is something of national or international importance. We consider that the list of examples of cultural and tourist attractions and facilities (11.9) should be broadened. In particular, the Quay and Canal should be included as both are significant tourist attractions and provide water sports facilities.

The reference to places of worship is welcome. There are also many clubs and societies which should be collectively referenced in the list as they add to Exeter’s culture and heritage.

While the Royal Albert Memorial Museum and its archives, the University of Exeter, Exeter College, the Central Library, the Cathedral and the Devon and Exeter Institution are listed as important cultural resources in the city centre, the largest resource for local documentation is not mentioned, the Westcountry Studies Library, a nationally important research collection which must be considered as a vital non-designated heritage asset. It includes not only historical collections but also information on the economy, natural environment and literary heritage of Exeter and its region. The Library is currently outside the city centre and subsumed in other archives. If Exeter is to become a true city of culture this collection should be at its heart and access for the community and visitors, students and researchers enhanced. This would bring considerable benefits to tourism, education and research and community inclusion. An Exeter Cultural and Heritage Centre in the heart of the city with staff able to document and interpret and promote these rich resources in co-operation with other initiatives such as the City’s cultural strategy, the Creative Arc, the UNESCO City of Literature designation and the Exeter Civic University Agreement would create an unparalleled resource, not just for community heritage but also for current awareness and meeting the challenges of the future.

We believe the statements made in this chapter could be more ambitious. We believe there is scope for a larger city centre auditorium for cultural events, including theatre, which Exeter lacks, and which should be included here.

Also, we are concerned about the lack of a city centre tourism or visitor centre. The History and Heritage section references assets of national importance such as the City Walls but there is little promotion of these to visitors. Whilst we appreciate that councils have had their funding cut over the past decade, a high-quality visitor centre should help inform visitors, increase footfall at heritage assets such as Tuckers Hall and St Nicholas Priory, and help stimulate the economy with more visitors. Is this something that can be developed with Exeter BID?

We question the inclusion of a statement about the circumstances in which a cultural (and we would argue sporting) facility should be lost to development (11.10). Finance is important but it is essential to distinguish between the facility and the organisation – a building can be put to different cultural uses or a different cultural organisation can have more success. Overall we do not consider that Exeter should lose cultural facilities.

#### **Policy C1: Protecting and enhancing cultural and tourism facilities**

The current single policy is disappointing. It should be strengthened and added to by:

- Including reference to sporting facilities.
- Stating that development proposals which result in loss of cultural, tourism (and sporting) facilities will not be acceptable (comments on 11.10).
- Including a reference to tourist and sporting facilities in the third paragraph of the policy.
- Supporting provision of creative spaces as part of mixed-use development or temporary use of vacant premises – recent and current projects in the High Street, Paris Street and Sidwell Street show what can be achieved.
- Incorporating relevant requirements from the emerging Public Arts strategy and other initiatives currently being undertaken.

## 12 High-quality places and design

We welcome the commitment to high quality places and design and its inclusive thinking. We support the recognition that significant infrastructure development will be required to make some of the large developments, (e.g. in Water Lane, Marsh Barton and Sowton) truly liveable and accessible.

We note that a Future Place Toolkit is being developed to steer development. We hope that this will be based on the government's National Model Design Code which states "*The National Planning Policy Framework expects local planning authorities to develop local design codes or guides, taking account of the National Design Guide and the National Model Design Code. This guidance sets out clear design parameters to help local authorities and communities decide what good quality design looks like in their area, based on local aspirations for how their area will develop, following appropriate local consultation.*" We are surprised that the Plan makes no mention of the National guidance because developers might rightly wish to follow that guidance. <https://www.gov.uk/government/publications/national-model-design-code> .

We strongly endorse the sentiment that development should 'reflect local culture and integrate with existing communities'. It should be a clear requirement that local communities must be involved in planning the development and have a critical say on whether it will indeed reflect local culture and support such integration. This is a major theme of the *Prospectus on the Redevelopment of the Wider Water Lane Area* we have prepared with local groups and are including as part of our comments on the draft plan. Both the Haven Banks and Water Lane developments have a long way to go to include the local communities in their planning, reflect their culture and integrate with them.

### **Policy D1: Design Principles**

This has many strong points. We consider however that

- The opening sentence 'Planning permission will be granted...' is too strong and should instead say 'Development proposals are likely to be supported...' as elsewhere in the plan. It should also make clear that this is subject to the proposals meeting the other policies set out in the plan.
- 'Retains and refurbishes existing buildings of good townscape value' is worthy of its own bullet point.
- It should include a reference to complementing the history and heritage of the locality, what we called 'its architectural vocabulary' in the *Prospectus*, ahead of adopting contemporary and innovative design. Ideally a development would do both.
- It should explicitly refer to integration with and involvement of local communities so that the development has their support.
- Reference to the design code should be included. We hope that supplementary planning documents and design codes will be embedded in the plan and policy with appropriate links to provide more clarity.

## 13 Health and wellbeing

We support the statements about health and wellbeing but think that more should be made of the potential impact of the expected population growth on existing health facilities and the expectation that developments will be accompanied by increases in provision. It would be prudent to include other examples as well as the RD&E and GP surgeries, for example dentistry and physiotherapy.

Development in neighbouring districts is at a similar or higher level than Exeter, and most or all people living there will expect treatment at the RD&E. Another 20 years of development could result in 39,000 new homes and about 93,600 additional people. It is essential that planning for health facilities is included in a new GESP with the neighbouring planning authorities.

There should be recognition that high densities allied to noise pollution can be detrimental to health and wellbeing.

There should also be a stronger explicit cross reference to the need for improved infrastructure (road layout and road user priorities) if the targets for walking and cycling are to be met, and of the need to develop public transport if some individuals are not to become isolated.



Inclusion of street trees is an important point, not just from a health and wellbeing point of view, but also to control city temperatures and water retention under a more extreme climate.

**Policy H1: Health and wellbeing**

The Health Impact Assessment should include an assessment of the development's impact on existing health facilities. It should also consider the development's own impact on noise pollution not only while building but also through for example high densities when built.

There is no national guidance for developing a Health Impact Assessment although there are models to follow. The city council should develop guidance to support developers in making their assessments, and the extent to which they should investigate. For smaller developments this could be over burdensome.

The policy should also include a requirement that developments minimise the likelihood of crime and anti-social behaviour and maximise safety for women and children.

It would be good to include some more detail of the previous points 13.7-13.11 in the actual policy, where these areas are kept too vague.

## **14 Infrastructure and community**

**Delivery of infrastructure.**

It is difficult to comment in detail on this section when two major documents are currently not yet available to see how this all will work: 1) Infrastructure Delivery Plan, announced to be prepared alongside the next version of the plan, 2) Review of the Community Infrastructure Levy (CIL) charges (which is underway, when to be concluded?).

We welcome the development of a new CIL and register. We hope that the CIL will be used in future to fund the identified projects. It is our understanding that a significant level of recent CIL contributions has been used to support the construction of St Sidwell's Point rather than the projects identified in the current register.

In the meantime and pending publication of the above documents and their incorporation in the plan, **Policy IC1** and the preceding paragraphs are supported. The Infrastructure Delivery Plan will clearly be an essential document which should ensure developers are fully aware of what needs to be developed before developing proposals or acquiring land. After the publication of the Infrastructure Delivery Plan the council must take a robust approach against developers challenging viability at a later date.

**Community facilities**

**Policy IC2: Community facilities**

For community facilities which serve the whole city (or indeed county and region) the emphasis should be first on accessibility and then on location. We assume that the work on viability will make it clearer what is expected of developers by way of infrastructure and community facilities associated with any development.

**Viability**

We are concerned with the section about viability because it invites developers to submit requests and appeals to not provide critical infrastructure. In our view this must only be implemented in extreme situations, and should at the very least, include a joint investigation between ECC and the developer to look at the existing and alternative proposals that could meet policy requirements. This is all the more important as these proposals seem to bite at the planning stage, i.e. before approval is given, and would further open the door to subsequent changes. The post approval stage also needs to be robust in requiring developers to stick to the original proposals, e.g. on affordable housing, particularly where alternative solutions may be available. There should be an explicit statement limiting the scope for post-approval viability and affordability claims.

The recent example of the redevelopment of the Clifton Hill site by Exeter City Living who obtained a relaxation of the requirement to provide social housing is an example of a scheme that could have been redesigned to ensure it was more affordable. The insistence there in having a new street cutting through an existing retaining wall, and not building to existing ground levels, added to high building costs – a redesign could have resulted in a cheaper scheme which could have afforded the social housing.

A significant factor in bringing forward brownfield sites is the cost of the land. Land owners and developers must agree a reasonable value for land in the knowledge of the cost of clearing the site, and the level of infrastructure needed to support development.

**Policy IC3: Viability**

This needs to be further strengthened in line with the comments above to make clear that the changed circumstances have to be extreme and changes to the original plans will rarely be agreed. The second indent should make clear that changes in costs or other requirements which could reasonably have been foreseen will not be supported. Reviewing viability every three years once there has been a change may be helpful but there are some obvious drawbacks to this, for example if a developer is no longer responsible for the site and its development.

## **15 Potential development sites**

We have some general comments on the development sites which apply to all or many of the sites. The proposed areas for development will lead to significant loss of car parking, e.g. at Haven Banks and Water Lane, outside the South Gate and the Red Cow development and elsewhere. This may be intended and could help to reduce car use but it could also lead to frustration and fewer visitors to central Exeter and the High Street. What is the loss of car parking spaces and how does the plan propose to mitigate this? Particularly for outer Exeter areas and the surrounding area - public transport seems an unlikely option given where things stand now, unless the Highway Authority develops plans for a locally operated 'public bus service'.

For all sites identified for development, we urge that most must be developed as low-car use sites rather than no-car sites. This is because a no-car approach will not enable many families to live there, or those who need a vehicle/van for work, or those with disabilities.

The proposals imply the loss of significant current employment areas, particularly Marsh Barton which has large purpose-built warehouse type buildings. How is the loss of employment land to be replaced? Is it envisaged that there will be less employment land in Exeter even if there is the same or more employment. And if there is less employment land, is it expected that jobs will effectively be transferred to outside the city? The Plan needs to be more honest in this regard.

The individual list of sites needs to give further information so comments can properly be made. In particular each site needs to show its proposed area in hectares and the estimated density of units per hectare and population with an indication of how this might be achieved. This information is not available on the website plan presentation, but we understand that a comprehensive analysis of each site is included in the recently published HELAA. A link to the appropriate pages would help inform readers and developers, a complete statement in the plan would be better. Some of the areas involve part development for housing, e.g. at Sandy Gate; so an estimate of the area and density of the housing/population needs to be made. This would also help to show what the plan means by 'optimal density'. Critically it would also indicate whether (some) blocks would need to be several storeys high and if co-living developments were intended to expand. The 'sliders' don't convince because they are computer generated artwork, not a realistic representation.

The individual sites cannot be considered in isolation from their surroundings and the services which are needed for the total local area. This is also an opportunity to show how local centres might develop, e.g. how the Tesco superstore site at Rydon Lane might be developed to offer greater, smaller, retail and hospitality outlets in a less car-centered layout to serve a new, larger local surrounding population.

Some individual sites have significant green components despite being listed or implied as brownfield, e.g. St Bridget's nursery, where a large part is effectively garden. There are also some greenfield sites. No environmental landscaping within a development will match the loss of green environment in these areas. The individual sites each list 'biodiversity gains' as an advantage, but given the green areas that will be lost in

some cases and that in others there will be little or no outdoor space, this seems more like a mantra than a realistic outcome. How is current biodiversity in these sites being measured and what is the target outcome and by what means will that be achieved?

Some sites are already heavily developed. Demolishing existing buildings and replacing them is counter to the principles of net zero carbon. If existing developments are retained then the density of the new ones will need to be very high to meet the targets (see earlier comments). Noise pollution could prove to be a significant problem where residential development is close to or mixed with some employment units. Marsh Barton may be particularly problematic in this respect.

Our comments on the individual development sites are set out below.

**Marsh Barton site.** There is no information in respect of the expected location of the first tranche of homes in this area. With an expectation that a district centre will be needed, as well as school places, there is likely to be a net loss of work places. The council should be clearer about this and consider where existing businesses will relocate to, and how people will commute there. In addition, every new home will probably require one new job to be created, but there is no mention of this. Access over the railway is mentioned (presumably at Clapperbrook Lane), but there is no mention of improving the existing pedestrian tunnel under the railway, or opening up the second underbridge at Tan Lane to give access to/from the Water Lane area – these are essential.

**Water Lane.** We are submitting our jointly written *Prospectus for the Redevelopment of the Wider Water Lane Area* which sets out a range of infrastructures off-site which are necessary to improve access to/from this area. We would suggest that the suggested additional crossing over the canal should be moderated to read 'including new or improved crossings of the canal'. The visualisation for this site shows the land adjacent to the canal being built upon, rather than being retained for boat repair. If the ambitions of developing the canal as a Heritage Quay are to be realised, all boat repair space must be retained and the essential natures of the Quay and canal retained and not overwhelmed by new development.

**Red Cow/St David's site.** In developing this area, it is essential that the forecourt of St David's station is developed as an attractive open space providing high quality provision for bus and taxi services. Much of the area is dominated by car parks. Some parking will still be required – it is not realistic to have no parking and few cars at the main train station. However, improved sustainable travel arrangements should also be developed so people do not need to use their car in this difficult to access area. The current rail level crossing results in significant travel disruption with queuing traffic on St David's Hill, Bonhay Road, and Cowley Bridge Road. New development in this area should include improved highways arrangements to reduce queuing traffic and allow the flow of commuter traffic.

**North Gate.** The description of the sites that may be developed does not look fully at the whole of the site area. We know that ECC has obtained government funding to investigate the provision of housing at Mary Arches Street car park(s) but there is no mention of this here. Additionally, the area includes the site of the Corn Exchange and buildings at the top of Fore Street, but again there is no mention of what is proposed for this area. If these areas are not intended to be developed the outline of the area should be reduced to provide certainty about proposals in this Conservation Area.

**South Gate.** We presume that development will take place on the two car parks in the area although this is not clear. We understand that the council has received government funding for housing on the Quay and Cathedral car parks so it would be good to have more detail included in the supporting information. The area includes land alongside the city wall, an ancient monument, but there is no mention of the impact of building close to this sensitive feature and how it will be protected. We support the suggested improvement to the city centre and quay, and would like to see the suggested zebra crossing across Western Way which was proposed in the South Street Improvement study.

**West Gate.** There is no mention of protecting the important site of the old Exe Bridge or of the City Walls and other heritage assets. The site map includes these and implies that the whole area will be developed.

**12-31 Sidwell Street.** There is no description of how/where this development will provide 51 homes. We presume that upper floors will be converted into homes. If this is the case it should be clarified. The description suggests that there will be an increase in biodiversity (as is the case for most of the listed sites), but we cannot see how a site with no external space can achieve this. What will be the mechanism for securing off-site biodiversity gains? The site description must be realistic.

**East Gate.** ECC proposes that the existing allocation should be expanded to cover the whole East Gate site. This may include demolition and rebuild of southern side of Sidwell Street up to roundabout at the Odeon Cinema, where attractive new businesses have been established in recent years. There are also some surviving Edwardian buildings in the eastern part of the south side of Sidwell Street. We consider these should all be protected rather than swept away.

**Belle Isle Depot.** We support the use of this site. The public consultation on this development in Nov/Dec 2022 made clear that it will not impinge on Belle Isle Park, as the mixed housing and apartments will be built on the current ECC depot footprint. Most likely it will not involve a loss in biodiversity, rather provide a good opportunity to improve it and make the park more accessible.

**Former Overflow Tesco Car Park.** The site currently includes areas covered by an area tree preservation order and trees covered by individual preservation orders. We consider development should be restricted to the car park itself. The text refers to 'protecting significant trees' but protection should be given to the area tree preservation order and the greenery surrounding the individual trees with preservation orders rather than leaving them isolated. To do otherwise would undoubtedly result in a net loss of biodiversity rather than the gain mentioned in the text.

**St Bridget's Nurseries.** Although perhaps identified as a brownfield site, substantial parts of the site are in fact 'green' as shown in the aerial photograph. To retain rather than lose biodiversity, development should be restricted to the areas currently built upon or tarmacked. The green areas provide a buffer to the main road and much needed breathing space for the Old Rydon Lane development,

**Sandy Gate.** This seems to involve the loss of existing housing. Is this correct? Demolishing existing housing and building anew is counter to the principles of net zero. If no demolition is involved the site plan needs to be redrawn.

**Land at Newcourt Road.** We question the attractiveness of this site, squeezed between the motorway and railway line and beneath power lines. Noise and light pollution will be very significant, reducing residents' health and wellbeing whatever the mitigation. Residents might reasonably expect to have decent outside space. Alternative uses should be sought for this site with an emphasis on biodiversity. This and the other three Newcourt Road sites will collectively result in further loss of green space and therefore the gap between Topsham and Exeter.

**Land to the East of Newcourt Road.** This will also suffer from noise and light pollution, albeit to a lesser extent than the previous site. Mitigation may help residents inside the buildings but is unlikely to be wholly successful. It will not help with outside space. It is hard to see how building on this greenfield site will involve a net gain in biodiversity given the proximity of green spaces. How will this be achieved? This and the other three Newcourt Road sites will collectively result in further loss of green space and therefore the gap between Topsham and Exeter.

**Yeoman's Gardens Newcourt Road.** This will also suffer from noise and light pollution, albeit to a lesser extent than the first Newcourt Road site. Mitigation may help residents inside the buildings but is unlikely to be wholly successful. It will not help with outside space. It is hard to see how building on this greenfield site will involve a net gain in biodiversity given the proximity of green spaces. How will this be achieved? This and the other three Newcourt Road sites will collectively result in further loss of green space and therefore the gap between Topsham and Exeter.

**Land to the West of Newcourt Road.** This will also suffer from noise and light pollution, albeit to a lesser extent than the first Newcourt Road site. Mitigation may help residents inside the buildings but is unlikely to

be wholly successful. It will not help with outside space. How will this be achieved? This and the other three Newcourt Road sites will collectively result in further loss of green space and therefore the gap between Topsham and Exeter. We also note that this land is within 500 m of the Exe Estuary and has been flagged red in the Habitat Regulations Assessment so is a direct threat to the natural environment and biodiversity.

**Land to the North, South and West of the Met Office.** It seems unlikely that there will be a net gain in biodiversity by building on a green field site, particularly given the number of units involved. How will this be achieved?

**Land South of the A379.** We question whether any noise mitigation will be successful. It may help inside building but will not help outside space. There also seems to be an implied loss of important wildlife habitat.

**Land Behind 66 Chudleigh Road.** It should be clearer in the plan how much of the site would be 'well managed public space' and therefore also what the density of building would be. It is hard to see how a gain in biodiversity could be achieved by building on a green field site with field boundaries on most sides. How will this be achieved?