



Established 1961

Registered Charity No: 286932

# Full Draft Exeter Plan Consultation Autumn 2023

## Exeter Civic Society Submission.

Submitted on 15 Jan 2024.

Contact: Gert Vonhoff, Chair Strategic Planning & Highways Group,  
gertvonhoff@btinternet.com

## General Points

Exeter Civic Society is pleased to have the opportunity to comment on this amended plan. We welcome the many amendments made, some of which reflect our concerns submitted in response to the Outline Draft dated September 2022.

We are keen that the council produces a plan that has policies that are clearly explained, written in a manner that supports the intention of the policy without ambiguity or confusion, and that will not allow an alternative and unintended interpretation of policies that will result in challenge at planning application stage. And to further ensure that there is no misunderstanding, we would like the council **to include a glossary of terms** for more clarity and to support lay people to understand the terms used. Here are a few examples:

“brownfield”, “walkable” (distance and/or time?), “employment”, “embodied carbon”, “major development”, “large scale”, “sustainable”. “optimal density”, “green infrastructure”.

Some of these are expanded upon in the supporting text to certain policies, but often without cross-referencing (e.g. “specialist homes” is referred to in S2 but with no reference to H7 which sets out what the terms means).

And is “specialist homes” in S2 the same as “specialist accommodation” in H7? If so, H7 should refer to “local needs”. What are “specialist homes” in H3? “Active Travel” is explained in Chapter 8, but Chapter 9 does not cross reference it. S2 refers to the “Urban Greening Factor”, but what that is only becomes apparent in policy NE6. By having a glossary of terms they can be applied across all policies (unless a policy has a specific trigger, e.g. H3).

### **It should be possible to understand the Plan without reading it all.**

On a general point, throughout the Plan various documents are quoted. In this electronic age we think all of these should have **a link to the document or web page** where the document can be found, so it is easy for those using the plan to access the information. It is highly likely that many people using and referring to the plan will do so electronically, but without links it will be necessary to search for them on-line, or to refer to an appendix. (Is it intended to have one? The links will obviate the need for such an appendix.) Should information change, or be moved to a different location, amendments can be made at each five-year review of the plan.

Our scrutiny of Chapter 15 with site allocations has highlighted a need for the strategic policy list of aspirations/needs for each site to be heavily edited to ensure these are deliverable, site specific and realistic. For example, North Gate – is it likely that, as E(v) says, electric vehicle charging points can be delivered in a dense city centre area which is expected to support no car development; and for South Gate, is it realistic to expect as in A(ii) custom and self-build plots on a site for multi storey homes?

Throughout the Full Draft Plan, there still is much inconsistency in the writing of policies and how they are numbered. Some have bullet points, some are numbered and some have letters. We also suggest that all individual points in the policy section must have a clear reference so that it can be referred to easily and clearly rather than quote ‘the third bullet point’ or ‘the third sentence’. Sub-lists which are not to be referenced clearly need to be avoided (see, for example, NE3, H4 or H6). For example, **all paragraphs in policies should receive a number, sub-lists then small letters, and in the next degree small roman numerals**. The online consultation version is even worse in all of these respects, without clear numbering of the supportive text compared to the printed version.

We welcome the introduction of the new category of 'Strategic policy', but do not think, this category is systematically applied yet.

## Chapter 2 – This is our city, this is our future.

2.10 says that members of the Place Board engage with communities. This seems misleading because it is only ECC and DCC that are likely to engage with communities and not the other members of the Board.

2.12 The Exeter Design Quality Partnership needs to have a link.

2.15 needs links and information about what partnership hopes to achieve, not just who/what it is.

2.15 should include the Exeter LCWIP.

We welcome the confirmation that the council is working with neighbouring planning authorities to develop a joint strategy for the wider area. But it is disappointing that this has not already been completed and its aspirations included in the plan. What status will the strategic plan have if it is adopted after the Exeter Plan?

## Chapter 3 Spatial Strategy

### S1 Spatial strategy (Strategic policy)

We welcome the change in policy to focus development on brownfield land.

Point 2: the opening word should be “enabling”: a planning policy cannot of itself create jobs. While new forms of employment might be preferred, does the policy risk ruling out developments that brought forward or maintained existing forms of employment, for example retail, hospitality and culture?

Point 4: it would be valuable to users of the plan if an explanation of “smaller” (e.g. a size range) were given.

Point 5: comment as for point 4, in relation to “modest”.

Point 10: this is weak, but policy CC8 gives the detail.

Point 11: as drafted it seems to duplicate Point 3.

Point 12: here, and elsewhere in the draft plan, the word “optimal” is used without definition. What is optimal for a developer may not be optimal for a resident. What is optimal in terms of efficient use of land may not be optimal for the landscape. And so on. **We suggest that the plan explains what optimal means in different contexts.**

#### S2 Liveable Exeter principles (Strategic policy)

We broadly welcome this set of principles. In particular we strongly endorse the opening statement that **all** strategic brownfield development proposals must demonstrate how **each of** the Liveable Exeter principles and requirements will be achieved (our emphases). We hope this ambition will survive viability testing of the plan.

**We would also like to see a statement that the relevant principles and requirements will be applied to the small-scale developments envisaged in S1 points 4 and 5.**

Other points which we particularly endorse:

- The opening statement on the importance of masterplans. This is essential, to ensure all developments contribute towards aspirations for an area and the infrastructure needed, making contributions through the Community Infrastructure Levy or Section 106 contributions. Masterplans must be undertaken by ECC with DCC and other statutory bodies, not left to developers.
- However, the 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 masterplan for a wider area, particularly if other landowners do not cooperate or share the same vision. **Masterplans must be developed by the planning authority with consultation with the local community, statutory authorities, and interest groups.**
- Principle 2, bullet 3, about enhancing the city's natural, built and historic environment.
- Principle 2, bullet 5, about incorporating stewardship measures which provide for the effective management and maintenance of the public realm and communal private spaces in the long term.
- Principle 3, bullet 5, about the phasing of infrastructure and facilities. We would highlight public transport, to reduce the risk of development encouraging private car habits.
- Principle 5, bullet 3, about reallocating road space to maximise active travel, public transport, shared mobility etc.
- Principle 7, bullet 6, about supporting "mean-while uses" pending full site development.

We have questions and reservations on the following points:

- (a) *Densities* (Principle 2 bullet 1 and para 3.12). is there an evidenced justification for the statement "The highest densities should be located in the most accessible and sustainable locations close to the city centre and public transport"? Does this mean that the availability of public transport will determine in advance the location of high-density development? And won't it be necessary to have high density housing in places other than proximity to the city centre if local populations are to be sufficiently numerous to generate demand for good local facilities as required by Principle 3.
- (b) *Culture* (Principle 7). We simply do not understand the meaning of the first bullet: Use culture to improve development quality to drive investment for strategic growth and sustainability in Exeter.) It may be concealing a good requirement, but it needs to be generally understood.

(c) *Height and massing of buildings*. The height and mass of new buildings is a particular concern. This was expressed clearly by the community at Haven Banks, and the initial plans for the redevelopment of the Clarendon House site are already attracting criticism because of the proposed 16 storey tower. It is therefore surprising that the plan is virtually silent on this issue, except for policy D1 which states that development proposals “will be supported where they [...] ensure that the scale, massing and height of buildings and other structures relate well to the site and its surroundings”. Note that the policy does not say that the failure to comply will lead to permission not being granted.

Some assurance may be provided by Principle 3, bullet 4 which states: “Provide safe, healthy, accessible and inclusive streets and public spaces which are people-friendly, human in scale, well managed and cared for”. But this is mandatory only in relation to the strategic brownfield sites; it should apply to all sites.

Accordingly, **we suggest that height and massing issues are reviewed properly in the plan, perhaps as part of the policies on density (H13).**

(d) *Enabling* (Principle 3 bullet 2). 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.

## Chapter 4 Climate change

ECS welcomes most of the substantial additions to the chapter. We hope that some of the policies can be further strengthened in the next phase, as national lead on this important issue seems to have weakened over the last year and goals do not look guaranteed at all in the longer future, despite climate change being the most vital challenge to our future on this planet. In this changing political landscape setting its own standards is of strategic importance for ECC. **We therefore suggest that all new homes and other developments should be required to be carbon neutral**; the new policy CC6 about ‘embodied carbon’ is an important corner stone for this.

### CC1 Net zero Exeter (Strategic policy)

Explanation 4.7 lists biomass energy from organic matter and energy from waste as a potentially important contribution to cutting carbon emissions. Though the formulation is taken back a bit since the last version, **we still insist that it should be clearly spelled out that this must not include wood chip**, as research over the last year has further strengthened the point that this fuel does not help the move towards zero carbon. **‘Energy from waste’ should only be the second option**, truly after moving towards a more circular economy.

Our call to strengthen bullet point 4 has been recognised and in line with the NPPF the Exeter Plan introduced the new policy CC2.

### CC2 Renewable and low carbon energy

This policy strengthened the attitude towards energy, though it shies away from ruling out all carbon energy emissions.

ECS finds the community involvement important, especially where the community steps in to provide solutions, be it as a group (4.11) or as an individual (4.13).

We wonder whether this policy will rule out district heating centres which are currently gas powered, and therefore not renewable or low carbon. How else will district energy centres be powered?

**We consider CC2 should be a ‘strategic policy’.**

### CC3 Local energy networks (Strategic policy)

ECS’s substantial concerns about this feature have not been taken into account at all. We therefore repeat what we highlighted in our response to the Outline Draft version:

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.**

### CC4 Ground-mounted photovoltaic arrays

ECS questions the viability of this newly introduced policy. With Exeter having so few open spaces left, ground-mounted PV arrays would most likely be on the brownfield sites which are already urgently needed for future housing. The need to strengthen home-grown food production means agriculturally viable land should be used less for PV sites. Furthermore, the National Grid currently does not provide enough capacity to connect already existing or planning approved PV arrays.

**Instead of this policy, ECS would recommend a policy on roof-mounted PV arrays on all new buildings.** We are surprised by the new policy CC7, as present PV panels use light rather than sun for their energy production, so all east, south and west facing roofs and even some north facing ones will be deemed efficient in our climes at least from April to October, and for these reasons should be a requirement for all new buildings, where the 'Future Home Standard's' aim of 75-80% fewer carbon emissions is targeted.

**A policy supporting the retrofitting of PV panels on existing buildings would be a helpful contribution to many private owners of older houses** who are currently unaware of their increasingly good generation options, especially where paired up with storage capacity.

There is also new research and development in (sea-)floating PV arrays, which might be suitable for Exeter to look into given the wide Exe estuary.

#### CC5 Future development standards (Strategic policy)

All welcome and important for future proofing. But we ask whether this policy is necessary if these requirements will be national. CC5 then adds nothing new Exeter specific.

#### CC6 Embodied carbon

It is hard to understand how this could not be addressed in the previous version. All agreed.

#### CC7 Solar-ready development

We disagree with the statement that even with the Future Homes Standard not all developments would incorporate PV panels. At the moment new developments not providing them seem to do so for potentially cost-saving reasons. However, the increase in initial building costs is minute in comparison to financial benefits over the lifetime of a PV installation. Installing them at construction stage of constructing a property should be cheaper than retrofitting because it will be possible to sit them flush to the roof with inclusive weathering materials. On the basis of this the policy must be rethought. Though solar-ready construction would be a step in the right direction, the benefits of **a policy demanding PB panels from the start would be better.**

#### CC8 Flood risk (Strategic policy)

The explanatory text under 4.35 should have a link to the source referred to in the last two lines.

As the policy is set out, site-specific flood risk assessments will be required for all development proposals at risk of flooding. We think that is excessive and unnecessary as **only Flood Zones 2 and 3 (medium and high) would need such an assessment.** 4.36 gets this better already and this needs to be used for a rewording of CC8. And not all developments will have flood risk implications, for example if a house is currently being used as two flats, amalgamating the flats to form one house will not have flood risk implications and a Flood Risk Assessment should not be required.

Instead of the acronym CC88 should use the term 'Sustainable Urban Drainage Systems'.

In the last sentence it needs to be explained what 'clear evidence' could be, and the bar for 'inappropriate' needs to be defined and high.

### CC9 Water quantity and quality

This new policy responds to some of our earlier critical comments and a shift in the debate over the last year. A lot of the underpinning planning work is still in process, like the SWW Drainage and Wastewater Management Plan. This then will help, so we hope, to shape the good intentions into a policy, the effect of which can be enforced beyond the limitation of water use per person per day (110 litres). In its current state CC9 is rather vague.

## Chapter 5 Homes

ECS shares the vision and the objective. We welcome the way this chapter has been made much more substantial compared to the Outline Draft Plan, especially that it now has details and a policy on 'Affordable housing', and different types of housing. Our comments on the Outline Draft Plan have been addressed.

### H1 Housing requirement (Strategic policy)

We still wonder whether a reframing is needed here, because a list (as presented here) is not already a policy. It remains unclear how ECC 'will target the delivery of at least 642 homes per year'. Will it put master plans in place? And what else will it provide to get the right homes in the right places?

**In light of the current Government position which sees government targets no longer mandatory, we would like to see the delivery of in total 14,124 homes to be justified.**

### H2 Housing allocations and windfalls (Strategic policy)

A list is not a policy. The revision of some of the numbers for the period till 2040 (Marsh Barton down from 1,880 to 1,000; Red Cow down from 430 to 280; but then East Gate up from 750 to 850; Water Lane up from 1,180 to 1,600) seems to provide a more realistic goal. It makes sense not to include Sandy Gate and West Gate for the reasons provided. The financially and developmentally sensible revision of the boundary of South Gate, which results in a much smaller site, however does not translate into the number of homes on the site, which remains at 170. This will lead to more density on the remaining plot, which translates into higher buildings and might mean an over-development of this site.

5.9 of the supporting text makes the point for residential gardens being included in windfall sites. ECS objects to this potential destruction of green space within the city and does not think the points made are sufficient to offer adequate protection. Adjacent gardens, especially where you have terrace buildings, often function as green corridors.



### H3 Affordable housing (Strategic policy)

ECS welcomes a substantial policy on affordable housing, especially that 50% of the 35% of affordable new homes will be for social rent. Point H3(a.iv) should include the detail from 5.15 of the supporting text.

We wonder if you really expect new homes to be sold at 50% cost as said in 5.15, or do you expect owners to then pay a rent to a social landlord for the other 50%?

**Under point (d) of H3 we would like to see more substantial referencing of the Local Housing Needs Assessment from Sep 2022** ('East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment 2022'), as 'must reflect' seems a weak wording.

5.16: ECC's potential negotiations for higher density needs a much clearer follow-up sentence than 'This may alter the affordable housing requirement'.

5.17 is not yet included in H3. **The overage clause policy** itself might create a loophole in the 35% target, but **should be included into H3(c)**. It is our assertion, as made to the recent CIL consultation, that land purchase costs should be adjusted downwards to reflect the needs and policies of the Exeter Plan. If this cannot be demonstrated, then there should be little support for reduced contributions.

### H4 Build to rent

ECS welcomes measures which ensure that build to rent affordable homes are of the same quality as market build to rent homes and preferentially provided on-site. Both sections (a) are in conflict with the wording in (b) which speaks of 'at least 15 years under a covenant'. No market analysis is provided here.

Bearing in mind that the government has frozen the local housing allowance many years ago, is it likely that social housing association rents (including services charges) will match the government allowance for those living in need of benefit? If ECC is not certain of this, policy (b) should be reworded to be more realistic.

### H5 Co-living housing

Guidance in size, communal space, facilities, tenancy arrangements and management has been provided now. The supporting text contains important details, especially relating to space standards and their calculations (5.25), that are not made clear in the policy. The future-proof considerations form a crucial element of this for Exeter new market segment. The list of adaptations in 5.29 should include retirement home use.

Nevertheless, we are disappointed that the council will not introduce its own space standards (similar to ECCs existing standards for standard forms of accommodation) and include them in para 5.25. Any national standards may be lower than the council would wish to see for studio accommodation.

Point (h): is it appropriate for ECC to 'regulate the type of resident'?

The market analysis provided under 5.37 for 'specialist accommodation' or under 5.31 for 'custom and self-build housing' is missing here for co-living housing.

5.27 should set a % reduction and state who this is aimed at, as it is unlikely that those on benefit will be able to afford the services charges, and will therefore be discriminated against. The one Co-Living development in the city has quite high minimum earning criteria.

For 5.28, criteria should be included or % of properties to establish at what point the level of co-living housing in a community will impact upon maintaining mixed communities (and should this also include student accommodation) and what is determined as an area?

5.29 should state that accommodation can be repurposed for post graduates, and should consider the intensity of students in an area, and if too intense (define), not approve such a proposal. In addition, there should be a timescale (2-3 years?) before this is allowed.

### H6 Custom and self-build housing

We understand that the council has had 23 expressions of interest for self-build homes a year (para 5.31), but it is clear the identified sites in policy H6 will not be able to meet such demand. It would be helpful here if expectations were expressed more realistically, which we hope will be the case when policy H6(b, first block) will be completed. In policy H6(d) should all plots be required to be freehold?

### H7 Specialist accommodation

A welcome chapter ECS asked for in its previous comments, provided here with market analysis and ideas where to locate this type of accommodation (5.37, 5.39). Are the two figures of 4,500 and 450 in the correct order in para 5.37?

### H8 Purpose built student accommodation

A good amount of analysis and reflection in the supporting text.

H8(a) & (b) are potentially contradictory. Clearer wording needed. There will be very few locations that meet the criteria in H8(a), in particular connections to the campuses by public transport, and so there will be inevitably 'concentration' of PBSA in these localities.

H8(d) might undermine the effort to move students from HMOs into PBSA, as HMOs normally allow car-parking arrangements.

In para 5.44 should cycle storage be included?

### H9 Gypsy and traveller accommodation

Some welcome ideas, but in part still to be concluded in the next version. Our understanding is that government now expects a site for gypsy and travellers to be identified for a plan to be found sound. In this respect, point 5.48 must be revised, as should 5.49.

The provision of a gypsy and traveller site was identified in the current local plan but the city is still without such a facility. And during that period there have been many instances of gypsy and traveller groups occupying public space causing nuisance and upset. Will the provision of a dedicated serviced and managed site(s) result in fewer of these incidents, and an ability to perhaps prosecute the perpetrators?

### H10 Residential conversions and houses in multiple occupancy

The Full Draft Plan follows our suggestion (Chapter 5, point 5).

We are unsure whether conversions of an existing building to flats and conversions into an HMO should be covered in the same policy. The supporting text is listing a lot of details which are specifically relevant to HMO conversions, these get lost in a policy which generally focuses on conversions into flats.

Policy text: 'Development proposals for the conversion or change of use of a building to a house in multiple occupation in the Article 4 area will not be permitted.' Better to say 'will generally not be supported' as there have been cases where it has been allowed because there are so many HMOs in a street, owners of C3 dwellinghouses can't find buyers. The only people interested in buying are commercial HMO landlords.

5.53 is much clearer and more restrictive than point (e) in the actual policy, where 'unacceptable' provides a rather vague term. A more precise wording for the policy is needed.

### H11 Loss of residential accommodation

An important clarification. But the wording of the policy is more restrictive than the supporting text. The policy should therefore say 'unless other material considerations indicate otherwise'.

### H12 Accessible homes

This needs to be linked to 'specialist homes/accommodation' in S2 and H7. This policy then can be deleted.

### H13 Housing density and size mix

We are surprised, given the central importance of this for the brownfield developments, how short and vague this chapter is. It does not refer or link to the 'Exeter Density Study' from July 2021. It does not say anything about the height of buildings related to their local neighbourhood, plot ratio and street ratio (compared to, for example, the 'Water Lane Development Framework and Design Guide', pp.63-67). Given that the increased density will mean flatted homes, should the policy not include external space requirements?

All of this together demonstrates that this policy needs a major revision, to clarify rather vague terms like 'best use' or 'optimising' – question is for whose interests: people living there, developers' profit?

Point (a) should include some of the details from 5.58. It could read: 'Make the best use of land by optimising density, so that it is appropriate for the site and surrounding area taking into account constraints such as heritage assets, local amenities and the character of the area and any on-site requirements such as public open space and active travel measures that are needed to ensure that development is of a high quality.'

### H14 Residential amenity and healthy homes

5.61 is stronger when saying: 'new homes must meet nationally described space standards'. The policy H14 then only says the following factors 'will be taken into account'. A clearer formulation of what is prescribable on the grounds of nationally described space standards is needed, then adding what else has to be taken into account. **The policy should explicitly adopt National Space Standards in new build housing.** And garden/amenity space?

In Policy H14 should there be two lists with a-d clauses? In the second clause 'a', should homes for those with disabilities be larger to allow for mobility aids, and if so, should the % be cited?

## **Chapter 6 Economy and jobs**

### EJ1 Economic growth in the transformational sectors (Strategic policy)

Although ECS welcomes this chapter, we **think it is still too one-dimensional on the knowledge economy and education as 'transformational sectors'**, though it now refers to creative industries as well. 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, 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 – both would form a basis to open up the policy for more forms and sectors of employment.

**It is the necessary transformation of existing sectors which will underpin Exeter's future economy as much as newer transformational sectors.** For example, some of the bigger, already established, businesses, like car repairs and servicing, might have to change in the coming years, 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 the 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 to the rest of the country.

With Exeter's strategic position for the rest of South West England, there could be market potential to be investigated for local solar panel and wind turbine as well as tidal turbine production. Why are these opportunities ignored?

The spelling mistake 'Heath innovation' in the bullet point list under 6.4 is not corrected, an indicator how little work has been dedicated to this part of the document.

### EJ2 Retention of employment land (Strategic policy)

The policy needs to specify what is considered to be 'employment use'. The current Local Plan says,

3.8 For the purposes of the Local Plan First Review, employment land is defined as all land and buildings which are used or designated for purposes within Use Class B1 (business), Class B2 (general industrial), and Class B8 (storage or distribution). On Marsh Barton/Matford, car showrooms are regarded as an acceptable use of employment land (see 3.26).

This does not stack up with changes to the Use Classes Order in 2020, particularly the new Use Class E. This includes the old B1 (offices, R & D, and light industry) referred to in the current Local Plan.

A Class E use can change to any other Class E use without (in general) requiring planning permission. Furthermore, Class E buildings can be changed to residential use under Permitted Development rights without requiring an application for planning permission:

Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (dwellinghouses) of Schedule 1 to that Order.

This right does not apply in certain circumstances, and when it does apply it is subject to conditions. The Local Planning Authority can also remove it (usually done in city centres) by way of an Article 4 direction, although Government is scrutinising these quite carefully.

**The Draft Exeter Plan needs to specify what ‘employment’ uses it is trying to protect (as does the current Local Plan).**

We assume ECC is aware of the limitations of what it can control, in particular moving from one Class E use to another (e.g. offices to shops) is usually outside of their control.

### EJ3 New forms of employment provision (Strategic policy)

The policy makes no mention of the technical and building infrastructure to support the new forms of employment. If dealt with elsewhere in the Draft Exeter Plan, it should at least be cross-referenced here.

### EJ4 Access to jobs and skills

The additions in this policy meet some of our concerns voiced in our review of the Draft Plan.

### EJ5 Provision of local services in employment areas

For this policy the before demanded clarification of employment uses (see under EJ2) is vital as well. Usually changes as listed under 6.17 will not require planning permission as they are all in Use Class E. We presume the policy is there to catch the odd situation not covered otherwise.

### EJ6 New transformational employment allocations

This section addresses our request to make clear where in the city the new jobs will be created; it closes a gap.

Most of the dedicated sites (land adjacent to Sandy Park, land adjacent to Ikea Toby Carvery site) are suitable, but will promote commuting into Exeter from land outside, as the wording

'in accessible locations on the eastern side of the city close to Junction 30' or 'within close proximity to [...] public transport' indicates.

We would like to see the four new transformational employment sites be dealt with like the other large brownfield site, giving them sections in Chapter 15 'Site allocations', to then further specify characteristics and development potential for each site.

The brownfield sites' focus for housing development sets the tone to locate more employment close to the new homes and cut down commuting. This should be taken into account in Chapter 6 too, e.g. by discussing new employment allocations in Water Lane or Marsh Barton.

## Chapter 7 The future of our high streets.

We are pleased to see added mention of developing a greater variety of uses in the city centre to improve its attractiveness, and not just a shopping centre. We are also pleased to see additional text included in HS1, although we now wonder if three policies should be developed because different parts of the city need differing criteria. At present HS1 is not specific enough for each of the centre types. We suggest HS1 as the City Centre policy, followed by HS2 for District & Local Centres, and HS3 for Emerging Centres. **We believe a policy for new centres in new communities should have some specific criteria to establish a minimum provision, such as food store, café/bar, pharmacy, hairdressers, food takeaway, cycle shop etc.**

In our previous response we suggested that the three large retail parks/areas should be identified as district centre because they serve their local area, offering the local community an opportunity to walk or cycle to purchase essential goods – Tesco/Rydon Lane, Stone Lane, and the Pinhoe Hoard area. We also wonder if the Moor Exchange site on Honiton Road should be included as an emerging district centre?

In respect of the city centre, **there should be a clear statement in the plan about making the city centre more attractive through pedestrianisation and reducing the level of traffic, especially delivery vehicles.** We would support measures to make the High Street free of all traffic, other than at night for essential deliveries. This would involve some rethinking of bus services, and provision of mobility assistance for those who need it, but the problems are not insuperable and such a change would improve the prospects of delivering policy HS1 (2<sup>nd</sup> paragraph).

In policy HS1 we are confused by the word 'comparison' – can this be explained better?

## Chapter 8 Sustainable transport and communications

### General observations

We welcome the expansions and clarifications in this chapter, compared to the Outline Draft version.

Striking the right balance between transport policies that support net zero and a healthier and people-centred environment on the one hand and, on the other, the strong desires of many (and for some, the necessity) of being able to drive a private car is challenging. It leads at times to ambiguity in the Draft Plan.

For example, the emphasis on increasing electric vehicle (EV) use does not appear to recognise that vehicles of all forms, irrespective of power source, are forms of pollution (particulate matter from tarmac, tyres, brakes etc) and are taking up space, intimidate pedestrians and damage residential street environments.

There is also the tension between those who live in the city and those who travel into it from the surrounding area. As the Exeter Transport Strategy noted, the Exeter travel to work area was the second largest in the country because of the relative paucity of jobs outside the city. The Draft Plan gives no indication that managing down this inward flow is seen as within its scope, other than a reference to park and change facilities in policy STC4. There is a good case for the plan being more robust in measures to discourage inward private car movements, for example by reducing the available public car parking spaces in the central area and supporting schemes for city residents' parking only.

That said, any substantial raft of measures to encourage less private car use will only be generally feasible and acceptable if significant improvements in public transport alternatives are put in place, both within the city and on routes from the travel to work area. This point needs to be stressed throughout the plan.

#### STC1 Sustainable movement (Strategic policy)

In the supporting text, para 8.2, we suggest the addition of 'Train Operating Companies' to the list of partners.

The last sentence of para 8.3 risks overpromising. Some of the key alternatives – public transport, car clubs, cycle hire – are outside the competence of the city council to deliver and, at least at present, the local transport authority's influence is constrained.

On the policy wording itself, we strongly support the ambitions set out in it. At the same time, we have questions about its deliverability. Specifically, it is not clear how outcomes (d) and parts of (b) and (e) can be achieved through planning decisions.

Detailed points:

- The notion that city-wide Net Zero will be achieved by 2030 is increasingly regarded as unachievable. To avoid the risk of the policy being invalidated it would be prudent to delete the words "by 2030".
- Outcome (a) is clear that developments which deliver on the spatial strategy will be supported. What is the policy on developments which do not meet these criteria? Will they be not permitted?
- In outcome (b), the reference to "on foot" is too limiting, e.g. for people with mobility challenges. We suggest replacing with "other than by private car".
- In outcome (c) there is a need to explain the "transport hierarchy". Words are available in para 8.3.

- In outcome (e) we do not understand what is meant by “ticketing systems combining low emission modes”. On EVs please see our comments on STC5 below.

### STC2 Active and sustainable travel in new developments (Strategic policy)

Para 8.8 refers to “appropriate” EV charging points. We hope this refers not only to quantity but also to (i) location and (ii) design. The charging points we have seen in Exeter are disproportionately large, out of character with the surroundings and take up excessive space on pavements. Clarification would be welcome.

Also in 8.8 the sentence “Infrastructure for shared mobility will be required to enable people to access transport in a different way” is obscure. Please clarify or recast.

We assume that DCC as the highways authority is signed up to this policy (which we welcome)? The last sentence – “transport provision will need to play a key role in place-making” – is not clear. Does it mean that the availability of transport will determine the characteristics of a settlement? Or vice versa?

On the policy wording our comment on Net Zero in relation to Policy STC1 also applies here.

### STC3 Supporting active travel (Strategic policy)

Para 8.15 correctly identifies the fact that there are barriers to walking and cycling in Exeter. From the context we think this refers to physical barriers which prevent direct routes. However we would like the policy to acknowledge that there are other less tangible barriers. In particular, the volume and speed of traffic is a significant disincentive to cycling, particularly to people who cannot access the LCWIP network without using a major road first.

In para 8.17, we suggest including “people with age-related mobility issues”, These are not the same as “disabilities”. This should also be reflected in policy wording.

We support the policy wording, subject to the following comments:

- (a) In the list of improvements, the criteria for inclusion are not evident. For example why is Western Way omitted from (c) and the Pinhoe Road corridor omitted from (e)?
- (b) There should be a specific reference to the need to widen many of the narrow pavements and inappropriate shared cycle paths in the city.
- (c) “Development proposals will be required to provide [.....] multi-modal parking to prioritise active travel for all”. Does this mean \*all\* proposals?
- (d) We are surprised that there is a specific reference to e-scooters. These are being evaluated in a limited number of local authority areas, and none of the “Greater Exeter” authorities is included in this list. Accordingly it is currently illegal to drive an e-scooter in the Exeter area.
- (e) In the same paragraph, we do not understand the meaning of “natural surveillance”.
- (f) References to major developments – see glossary.



#### STC4 Supporting public transport (Strategic policy)

We fully support the aims of this policy, and have the following detailed comments.

- (a) “inclusive, direct, frequent and reliable public transport”. We suggest that serving as many points as possible is just as important as services being “direct.”
- (b) We are not persuaded that the Devon Metro scheme as currently conceived is going to secure a sufficient shift of journeys from private car to rail. Quite apart from the destination limitations of rail compared to bus, the planned minimum half-hourly interval is inadequate. If someone just misses a train, will they really wait 30 minutes for the next one? A proper Metro has a daytime service of at least 10 minute maximum intervals, and often more frequent. We suggest the policy objective should read: “By supporting continued increased frequencies on local rail lines into Exeter.”
- (c) We suggest identifying St Thomas station as a second site for improved interchange facilities (assuming “interchange” means changing between rail and other modes, and not just changing trains). Bus service to the city centre are more frequent from St Thomas (and serve a wider range of destinations) than those from St Davids. According to ORR passenger throughput figures for 2022/23, St Thomas was the 4<sup>th</sup> busiest station in Exeter and the 11<sup>th</sup> busiest in Greater Exeter.
- (d) To make such a change at St Thomas, it will be essential to act on rail policy (d), i.e. improving accessibility and level access at all stations. Within the city boundaries St Thomas and Polsloe Bridge can only be accessed by steep staircases and St James Park also has (fewer) steps to access the Exeter platform. We suggest these stations are shown as action priorities in the plan.
- (e) While we fully support the goal of multi-modal ticketing, it is difficult to see how this will be achieved through planning decisions.
- (f) References to major developments – see glossary.

#### STC5 Supporting new forms of car use

We have reservations about this policy. As it stands, it encourages an increase in EV use without proposing compensating measures to reduce petrol/diesel car use. There is therefore a risk that the policy as drafted will lead to a net increase in private car ownership and/or use.

This has two particular consequences:

- (1) Although EVs do not generate the same level of emissions as petrol/diesel vehicles (except in battery manufacture) they are not pollution-free. In 2021 10 % of total PM2.5 particulate emissions came from road wear and brake and tyre wear.
- (2) The other advantages of reducing private car numbers (e.g. less congestion for public transport, people-centred streets) may not be achieved.

The statement “Electric charging points should not be located where they would have a negative impact on the safety and functionality of the highway including footways, residential amenity or heritage assets and their setting” is welcome in principle though it is not clear how it will be achieved in practice. Very many existing dwellings are in Victorian or Edwardian terraces, with relatively narrow pavements, and whose amenity would be

destroyed by the installation of large numbers of the type of charging points so far seen in Exeter.

**To manage the number of charging points, we suggest that the policy should prescribe a ratio of charging points to dwellings, including for existing buildings.**

#### STC6 Travel plans

We suggest that the important statement in para 8.29 that travel plans will usually be required at outline planning stage should be included in the wording of the policy itself.

8.28 Whilst we accept that for commercial developments travel plans can function from occupation with a travel co-ordinator, we note that for some residential developments public transport and cycle routes and connections are often not available from the outset which results in people being dependent on car use despite many developments being promoted as low car use and well connected. Can we suggest that developers ensure active travel routes are functional from first occupation?

#### STC7 Safeguarding transport infrastructure (Strategic policy)

We support the aims of this policy.

#### STC8 Motorway service area (Strategic policy)

We have no comments other than to note that in the policy wording "Moor Lane" should say "Sowton", for consistency with the text.

#### STC9: Digital communications (Strategic policy)

It would be Canute-like to object to this policy, though we leave detailed commentary to those with more expertise.

There is, however, one consequence of continuing to increase online capacity with potentially negative consequences for the plan. That is the growth in delivery van movements in residential areas generated by online shopping. The plan is silent on this issue, and we suggest that policies for managing this trend should be explored.

**ECS therefore suggests one more policy in this chapter:**

#### STC10 Last Mile Delivery Hubs

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).

**Policy STC10: ECC will support facilities that will reduce the need for vans and lorries to travel into the city centre and residential areas.**

## Chapter 9 Natural environment

ECS is pleased to see a fuller chapter here with 3 more policies, but at the same time is disappointed to see some of our previous comments not making it into the revised plan. In the Vision part of this chapter, the newly added section of 'City of Culture' reads oddly: seeing protecting the hills surrounding the city and the Valley Parks as retainment of Exeter's cultural identity, works with a very wide concept of culture, which we do not find helpful here. We suggest to delete this section in the vision and the subsequently added sentences and phrases throughout the chapter.

### Objective:

Add 'River Clyst and Exeter Ship Canal after 'and River Exe', as 9.1 and 9.7 include them.

It is interesting to see that the net zero carbon city has no longer 'by 2030' here, despite the date being upheld elsewhere in the Plan. This indicates that some more systematic cross-reading will be needed to improve the coherence and systematics.

### Introduction

The Proposals Map mentioned under 9.3 and again under 9.6 shows in the printed version without the protected areas (p. 110). The online version provides a misleading key.

### NE1 Landscape setting areas (Strategic policy)

9.7, second bullet point: 'Avoid prominent ridges and slopes and, in particular, steeper slopes' –The University of Exeter;s recent Campus West halls did not conform with this aspect. What can be done to avoid a repeat? 2<sup>nd</sup> bullet point should read: 'Avoid development on prominent ridges...'

9.7, third bullet point: change 'treed' into 'trees' (typo).

It is not clear what 'Landscape Setting Areas' are. Are they the highlighted areas in the Proposals Map? Better explanation needed.

The layout of the policy NE1 is a clear case, where improved indentation and counting the subpoints would help the understanding of the document.

We find it difficult to understand the logic of the introductory sentence of c). Would it be clearer to replace 'and' by 'but'? Despite the partial reformulation it still provides a wide loophole for development and needs further strengthening. The categories listed under c.) need to be interpreted with the details provided under 9.7; in other chapters there is a clear link from the policy to the explanatory text set, why not here?

### NE2 Valley Parks (Strategic policy)

It looks to us a weakening to lose the last paragraph from the Outline Draft document, dealing with access to the Valley Parks from new developments. However, this perhaps is now covered in NE4.

Point (f) could enable development which would be highly problematic, as the recent decision to install a solar panel farm in university grounds has shown. To limit similar conflicts in future, a much clearer wording of what is meant here would be welcome.

### NE3 Biodiversity (Strategic policy)

Reference to the different parts of this policy would be greatly improved if the different aspects were counted through from 1-5. This way a clear reference to the subpoints would be guaranteed.

Here or in the commentary the 'at least 10% measurable net gains in biodiversity' needs to be explained further: where and how can this be achieved, how can it be measured?

1<sup>st</sup> paragraph: we don't understand how an increase in biodiversity could 'encourage cultural exchange'. This is one of the many sentences, where adding such an element is ill advised.

2<sup>nd</sup> paragraph: Can this be said in a more direct way, with less negations included? At the very least we think the logic would demand it reads 'have an adverse effect' instead of 'have no adverse effect'.

3<sup>rd</sup> paragraph: replacing 'the advice of Natural England will be taken' with the present formulation 'it will not be permitted unless the benefits of the development clearly outweigh ...' potentially weakens this point, as it leaves it very open to adverse interpretations.

5<sup>th</sup> paragraph, point (e): this new aspect is a welcome addition.

### NE4 Green infrastructure (Strategic policy)

A definition of 'green infrastructure' in a glossary or/and at the beginning of the explanatory text (as in other chapters) would greatly help the understanding of this policy. Should there be a reference here to The Fields Trust expectations as set out in chapter 14 Infrastructure and facilities?

9.20 should link to the document. The last sentence of this paragraph can be deleted, as it does not have a function in the Exeter Plan.

We welcome the inclusion of 'all development' under 9.22 and in NE4 itself.

**In order to make Policy NE4 more consequential, we would still like to see quantitative requirements for green space provided per household.** It feels suitable to provide a comparable approach as in Chapter 14, where quantitative measures are provided for infrastructure and facilities. We feel this is even more important, as the provision of green space generally has been very low in recent planning applications.

### NE5 Green circle

ECS welcomes the protection of this Exeter feature in the Plan.

### NE6 Urban greening factor

To follow Natural England's policies here is an important addition to the Outline Draft. The necessity of an operation and maintenance plan for the retainment of the green features throughout the life of the building provides a crucial safeguarding.

### NE7 Urban tree canopy cover

The 5.5% uplift of tree canopy cover for major new developments is problematic and reads better than it supposedly is: from a low pre-development baseline as the case in many of the brownfield sites, 5.5% does not increase the number of trees much. Especially where higher density development is sought, **ECS would like to bind the tree canopy uplift to the number of new homes** instead. To link the measurement to 'once [the trees] reach maturity' is further limiting this policy and should be rethought.

'All new streets must be tree-lined' makes sense in cooling terms as well; it should not be watered down to off-site provision as suggested in 9.36. Street trees will make it necessary for ECC to collaborate with DCC on this in a better way than in the past.

## **Chapter 10 History and heritage**

The detail now provided is welcome. The chapter and policies do greater justice to Exeter's heritage.

### HH1 Conserving and enhancing heritage assets (Strategic policy)

The protection afforded to heritage assets which may suffer substantial harm is in reality the same as that for less substantial harm. Both harms can be overridden by the public benefit test. Moreover, it is inconsistent with policy HH3 which applies to the City Walls, which states that development which causes harm will not be permitted – there is no public benefit test and the harm does not have to be substantial. While we agree with such a restriction applying to the City Walls, there are other heritage assets of equal value – for example the Cathedral and its Close and the Bishop's Palace. Other significant heritage assets should be afforded similar protection to the City Walls or, at the very least, no development should be permitted if it would cause substantial harm and there should be no public benefit test applied to the development.

The final paragraph of HH1 should also be strengthened. At the moment it envisages the loss of a designated asset, which is at odds with what has gone before in this policy and the thrust of the chapter. **It should be made clear that loss, either in whole or in part, of a designated asset must be avoided and that any development which would result in this will not be permitted.**

### HH3 Conserving and enhancing Exeter City Walls

While we support the idea of developers making payments to maintain the City Walls, these are no substitute for an annual rolling programme of maintenance. It may take many years for a development to occur where it would be legitimate to seek such maintenance

payments. In the meantime the walls will decay further, becoming a sad reflection on Exeter's willingness to preserve its heritage. Sections may even become beyond repair.

In the second paragraph, change to 'Development proposals *in the vicinity of the city wall* will be required'. Define 'where necessary' at the end.

### Omissions

**The recent Heritage Harbour designation for the Quay and canal basin should be reflected in the text and the policies.**

We are disappointed that there is no specific reference to buildings with blue plaques, either in the main text or the policies. 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 and so are a direct expression of local feeling and inclusion.

## Chapter 11 Culture and tourism

We welcome the approach taken. However, there is no mention of:

- The value of public open spaces and parks;
- Sports facilities, except in relation to Exeter City and Exeter Chiefs.

**The text should reference both of the above. The policy should offer protection to them in the same way as it does for cultural and tourist assets.** (NB There would also be scope to cover both aspects in other chapters e.g. on healthy living but they are omitted there too.)

It would help the reader if web links were provided to the various strategies referenced in the chapter. The University's own Sports Strategy and Exeter City Council's Sports Pitches Strategy may have further points for inclusion in the plan.

## Chapter 12 High quality places and design

In the previous consultation for the outline draft plan, we highlighted the need to mention the government's National Model Design Code, and whilst mention of design codes is now included rather than the Tool Kit, we are disappointed that there is not more recognition of the Nation Model Design Code process and principles.

Having scrutinised and made a response to the recently consulted Water Lane Framework and Design Code, **we now believe that this chapter should be expanded to give more examples of what may be included in a design code**, even though we expect the council to produce these. We also believe that engagement with local communities, interest groups and stakeholders should have greater emphasis. The NPPF clearly states that **local authorities and communities decide what good quality design looks like**, but we have

seen that in preparing the Water Lane Design Code that there was minimal engagement with the local community before it was drawn up. It was the Civic Society that engaged with the community and produced a prospectus for the area, and whilst we noted it was referenced in the code document, it was not clear whether the council included the recommendations in it.

We are disappointed that there is no mention of preparing masterplans for the new areas of major development, although the need to reference SPDs is mentioned. We hope these will be Master Plans which will inform Design Codes, as recommended in the Nation Model Design Code. **We would like to see the process of developing masterplans, design codes, and then development responding to these, clearly mapped out in this chapter.**

In 12.2, we note and welcome the need to build to 'high density' has been changed to 'optimal density', and that densities should be 'appropriate to local characteristics. But we think that **the term 'optimal density' must be explained. This reframing to 'optimal densities' needs to be applied consistently throughout the Draft Plan.**

In paragraphs 12.3 and 12.4 the Liveable Exeter principles are mentioned as providing more detailed concepts. Whilst these differ from the principles of the National Model Design Code, we think it will be helpful to include the LE principles in the code.

## Chapter 13 Health and wellbeing

We welcome the expansion of this chapter with a new policy relating to pollution and contaminated land. In particular, we are pleased to read in 13.4 that DCC has produced a Joint Health and Wellbeing Strategy, but wonder whether some of the major points from that document should be included in the plan for the benefit of developers.

And it is also pleasing that 13.5 highlights the government's new Healthy Homes Bill which we hope will become an Act in 2024. Whilst we appreciate that you have included some aspects of the proposals in this chapter, it would be useful if there was a more positive statement here that ECC will expect planning proposals to reflect any new law.

The amendments in 13.12 are welcome.

We still encourage the council to be more explicit about the contents of a Health Impact Assessment due to the lack of national guidance.

The guidance for policy HW2 is welcome, especially 13.19 requiring developers to demonstrate that resolving issues with problem sites are technically and economically viable **before determination**, with no satisfactory and safe amenity spaces.

## Chapter 14 Infrastructure and facilities

This seems a critical chapter and we must hope the Infrastructure Delivery Plan supports what is set out.

In para 14.2 we do not think the plan identifies the infrastructure that is needed: it generally sets policy; and specific needs are largely expected in other documents such as the LCWIP

and Infrastructure Delivery documents. **We therefore suggest clarifying the role of the plan as follows: “The Exeter Plan will provide the essential framework within which decisions can be taken about what infrastructure we need, and about ensuring it is provided in the right way, at the right time and in the right place.”**

#### IC1 Delivery of infrastructure (Strategic policy)

We note the first draft of the Infrastructure Delivery Plan, which is welcome, though we do not propose to comment on the detail here.

In the policy wording, we question whether the requirement for infrastructure to be delivered “at the earliest practical opportunity and phased appropriately” is strong enough. **Either in the plan itself or in supplementary guidance, we suggest that a timetable for delivery should be required as a condition of consent.** There is a huge range of infrastructure considered in this Chapter. A range of standards could be suggested, e.g. if there is a lack of school places at the outset of development, if no buses upon first occupation etc.

#### IC2 Viability (Strategic policy)

The emphasis in this policy appears to be on facilitating viability claims. **We suggest that the policy wording opens with a clear statement that the council will have a presumption against allowing changes on viability grounds.** NPPF paragraph 58 allows the authority to do so.

We suggest an explicit presumption that site purchase prices should have reflected the needs for each site based on the plan, and that where developers have overpaid, they should be expected to make less profit rather than reduce the quality of the development or cut the proportion of affordable accommodation.

**We therefore propose adding as a final section to the policy wording: “Action by a developer to secure land by overpaying against its fair value will not constitute an acceptable ground for a viability appeal.”**

We also propose that **any appeal on viability grounds should be preceded by a joint investigation between ECC and the developer to look at how the existing (or alternative) proposals could be made to meet policy requirements while achieving viability.**

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.

#### IC3 Community facilities (Strategic policy)

It seems that existing and new facilities are too mixed in this policy – should there be two policies?

In 14.17 should applicants/developers and community be added to the second sentence?

In 14.18 it must read ‘is no longer viable’ (typo).

We welcome the addition to the second paragraph highlighting the importance of local community engagement.



**We question the policy requirement that the default location for city-wide facilities should be the city centre.** Accessibility is more important than location, and the availability of suitable space – not always easy to find in the centre - will be critical. There is also a case for distributing city-wide facilities around the whole city area, provided accessibility requirements can be met, and so allowing different neighbourhoods the opportunity to host major facilities and, perhaps, develop distinct identities as a result.

We welcome the aims of the final sentence of the policy wording (about change of use), though question whether the expression “community function” is sufficiently precise to avoid arguments about the scope of the policy. The supporting text (14.18) refers to pubs, but it is arguable that any private business whose customers are primarily local would be covered (e.g. take-away food outlets, key cutters, dry cleaners, repair shops). Is this the intention of the policy?

#### IC4 Sport, recreation and allotment space in new development

We doubt that this policy makes sense in relation to very small residential developments (say 2-3 dwellings) although the wording allows for no such flexibility. Should there be a specific number of dwellings above which the policy would apply?

We have concerns about the treatment of allotment provision. The Fields in Trust guidelines will relate largely to houses where there is already a garden for growing some food. Flatted developments will be lucky to have a balcony on which to grow herbs, so the ratio of 0.23 Ha/ 1,000 people is flawed.

In addition, the provision of land for allotments in brownfield site areas will be problematic because the cost of purchasing the brownfield land may be high, but the value of allotment land is probably at agricultural value. **ECC must identify allotment sites and expect contributions from developers to acquire and develop, even if that is on the edges of the valley parks.**

We wonder if sports facilities need their own section and policy. It is probable that the need for more pitches will require a lot of people/homes, and the provision may be better in an existing playing field location, including the provision of more changing rooms. The growth in female football and rugby should also be factored in. This is clearly a strategic need that ECC and Sport England must resolve but there is no mention of Sport England in the Full Draft Plan. The removal of any sports facility or pitch must be considered by them but there is no mention of this.

In 14.23 it must read ‘that the new strategic’.

14.25 Playing Pitches – rather than just paying attention to ECC’s playing pitch strategy, it should be added that they should make an appropriate contribution towards off-site provision.

What about built sports facilities – we cannot recall any mention of new or enhancing any provision, although the CIL strategy does aspire for this at Whipton and Wonford which is not where most development will be located. Can the Riverside Centre cope with demand from Water Lane, Marsh Barton and St Davids, as well as perhaps Southgate?

### IC5 and IC6

We broadly support these.

For IC6, we think **there must be a presumption that ECC will investigate the need for cemeteries and to identify land for new provision rather than for this to be determined by others**. We wonder who pays? If it is developers, this should be in CIL and in the Infrastructure Delivery Plan.

## **Chapter 15 Site allocations**

The increased detail of information here compared to the Outline Draft follows a template which is adapted to the specifics of each individual site. This approach safeguards standards, but currently does not allow for enough site specifics to be included to discuss their own identity. A more site-specific approach has to be added.

The chapter should also include specifics for the new employment allocations sites mentioned in Policy EJ6, and the predominantly residential allocations, as included in the on-line consultation, although we appreciate that for the smallest sites this may be unnecessary.

### Marsh Barton

The vision for this site enlists more details than in the previous version. It says now 1,000 homes by 2040, but leaves open what is planned for beyond. ECS welcomes the phased delivery of the site as a redevelopment from predominantly low density employment area to a higher density mixed use for employment and housing. 15.14 confirms future openness of the approach.

We are in favour of the master-planning exercise to deliver the redevelopment, but want to point out that this must be done at a much earlier stage than in comparable recent developments that did not leave time for master planning. We want to see the development of a masterplan written into the actual policy of Reference 14.

A master plan is crucial if, as is stated, the area is in multiple ownerships because it cannot be expected that individual site owners will have the capability of considering the total needs of the area which, according to the Liveable Exeter website, expects 5,500 homes to be built in the area. It will clearly be beneficial to have a co-ordinated approach to development rather than to be sporadic which may not result in the development of a new community environment.

(C.iii) should not allow the alternative to a new surgery: delete 'or contributions to GP provision'.

(C.vi) and (D.iii) are the same; delete one.

Of crucial importance for the redevelopment are: (C.vii) an all through school, (D.iii) the safeguarding of the disused railway line, and (E.iv) on site provision of allotments.

We do not understand what is meant by 'adverse effect on the European Sites' in (E.v).

## Water Lane

ECS wants to see the consultation with the local community as a requirement before the submission of planning applications (15.22) being written into the actual policy itself.

It would be necessary to explain how the increase from 1,180 to 1,600 homes can be allocated in roughly the same area. We expect that this is only possible by even greater height, and would oppose that.

The policy must address (under point (A)) the close proximity of existing neighbourhoods in the area and how the new buildings should not be over-powering in their density and height.

(I.iii) should include the provision of access to the historic Canal for larger boats and ships.

Point (D) must address the insufficient traffic links from Water Lane to the wider area as an issue to be resolved not just by the developers.

## Red Cow Site

The site area has been extended to the south to include the student accommodation of Brunel Close which is designed at a residential scale in terraces and up to 3 storeys, and probably built in the 1980s. Perhaps not surprising, because most modern student blocks are multi floor blocks, and such a proposal here would increase the number of student rooms – we cannot see that the site owners would give this up for other residential use. To the north the site now takes in all the railway land alongside Cowley Bridge Rd to its junction with New North Road.

We have the following comments for the requirements of the site.

Is it realistic to require land for custom and self-build homes between the road and railway?

In section D- Transport & Infrastructure, there is no mention of reviewing the current highway congestion created as a result of traffic queuing for the level crossing towards Exwick. It is important to alleviate this congestion to enable public transport to move more efficiently.

Item iii of the transport section mentions contributions to active travel and cycling in the LCWIP, but it would be useful to be more specific such as identifying the proposed route from the station to Cowley Bridge alongside the rail line.

We support the proposals in section H for a built form that enhances the character and appearance of St David's Conservation Area and retains sight lines of locally listed St David's station. We emphasise a need to maintain views of St David's station from Bonhay Road and for the development of the forecourt to establish an improved sense of arrival.

## North Gate

Our main criticism of the "North Gate" section of the Exeter Plan is the lack of detail - where it would appear that the detail is known by the authors.

Specific points ECS wants to raise are:

Assuming the development site is only the yellow area on the plan, it would be helpful if an additional plan could be included identifying which areas (a) will not be developed, (b) could be developed, and (c) definitely are open to being developed.

Paragraph 15.30 refers to the need for further work and consultations which is quite understood, however it would be very helpful to understand the assumptions behind the figures in the Strategic policy. Where is it thought that the '200 homes' could go? Are there any overriding assumptions regarding the 'blocking' or height of new buildings?

It would be helpful to know what the perceived priorities are between the various requirements listed in paragraphs A to I. Is the priority housing or is it employment provision or is it the education needs listed?

## South Gate

There is very little to disagree with in the opening chapters but the issues are in what will be proposed. The society was invited to respond to a pre-application planning application earlier in 2023 that proposed a scheme which would block views between Holloway Street to South Street, and therefore not establish 'an impressive and memorable city centre gateway' that is called for in the list of criteria. We also expressed concerns about the proposed road layout which deviated from the existing and historical street pattern, which we considered unnecessary.

We would question the following:

The provision of custom and self-build plots seems unlikely on this city centre site.

The provision of public realm space for community and cultural activities is probably unnecessary – the proposals should focus on providing amenity space for its residents.

In the transport section (D) we would contest that whilst it is desirable to have active travel links from this site, issues such as the busy nature of the roads in the area, and the lack of any nearby cycle routes to connect to would need to be addressed. There is also a suggestion for a new pedestrian / active travel route from the city to the quay. In our response to the pre-application we made the point that this is not the primary route from the city centre for residents and tourists, and that an improved route via Coombe Street would be better (as in the Council's South Street study). We also pointed out that a route via Friars Gate is not very attractive with a steep path running parallel to the city wall, or steps alongside the Prospect Inn.

The provision of a mobility hub (D.iv) is probably unnecessary because of the proximity of local bus stops, and the probability that the flats will have cycle storage, as is a financial contribution to public transport for the same reasons.

We support item (H.ii) which requires development to enhance the character and appearance of the Southernhay & The Friars conservation area.

(H.iii) suggests that the development should make a contribution towards the repair, maintenance and enhancement of the city wall where appropriate. As the site is only partially adjacent to the wall which is properly maintained in this section, this must be looked into again, as it seems an unnecessary tax on the development.

## East Gate

We support the inclusion of this area in the list of strategic development sites. We agree that much more work needs to be done to develop specific proposals (para 15.39). At this stage we have the following points.

The apparent loss (to home-building) of the present Triangle car park site is sensible: It is in line with the need to reduce car parking opportunities in the city centre. However, it will be important to ensure that the height and mass of any development there does not overwhelm the adjacent housing in Clifton Road and Codrington Street.

Development proposals have been submitted for the old police station site (21/1564/OUT) and are being worked up for the Clarendon House site. Both of these include purpose-built student accommodation (PBSA). Policy H8(b) of the Draft Plan states that a condition of planning permission for PBSA developments is that they “do not contribute towards an excessive concentration of purpose built student accommodation in the locality”. Given the existence of PBSA already within the strategic site area (the Depot, the Barn, Central Living, Printworks, Kingfisher) and close by (James Owen Court, Trust House) there is a strong case for including a ban on any further PBSA in the policy statement for the Eastgate site.

The Paris Street/Heavitree Road/Western Way roundabout detracts from a liveable environment. While recognising its importance in the city’s current highway network, we suggest that the policy wording explicitly states that proposals to improve the overall environment particularly relating to policy sections C, D and E should not be constrained by the present traffic infrastructure.

## **Call for new sites**

### **Debenhams site / Bedford Street**

Alongside the strategic brownfield allocations dealt with in the Plan, ECS wants to see one more brownfield site to be dealt with: Debenhams Building and former post office, cafes and restaurants opposite on Bedford Street.

These buildings have been empty for too long now to just take this as a normal re-renting issue and leave it to the market to sort it out. The negative impact on the rest of the city centre is increasingly showing. ECC should include them in its long-term redevelopment planning, with the aim to transfer these former outlets to new/alternative uses.

Examples for this can be found nearby, where large former Debenhams buildings have been transformed into an alternative department store, event space and art centre in Bristol (Sparks), and a motor museum in Taunton.

## **Other predominantly residential sites**

There is no detail for any of the sites presented other than a map with a key.

### **Land at Old Rydon Lane - Reference 89 - 350 dwellings**

Surrounded by the railway line and very busy roads, the suitability as predominantly residential site is questionable.

### **Land at Cowley Bridge Road - Reference 143 - 231 dwellings**

This site currently has a planning application in for PBSA. We wonder whether it should be listed in the Plan at all.

### **Exe Bridges Retail Park -Reference 39 - 230 dwellings**

This site as currently developed serves as a district shopping and service centre. Its existence will become even more prominent with the redevelopment of Haven Banks and Water Lane. Any redevelopment will have take that into account. A predominantly residential transformation with 230 dwellings will not support the current vital retail and service function.

### **12-31 Sidwell Street - Reference 51 - 51 dwellings**

We assume that upper floors in the buildings between John Lewis and St Sidwell Centre will be converted into homes.

### **Land at Exeter Squash Club, Prince of Wales Rd - Reference 26 - 40 dwellings**

The loss of a sports facility is regretful and a similar facility should be provided elsewhere in the city. If this is possible, and despite the site being ideal for student accommodation, we do hope that ordinary residential accommodation can be built to support the council's target for such accommodation.

### **Land at Newcourt Road, Topsham - Reference 91 - 38 dwellings**

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 adjoining Silverlands - Reference 18 - 37 dwellings**

### **Belle Isle Depot, Belle Isle Drive - Reference 72 - 33 dwellings**

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.

**Land to the west of Newcourt Road, Topsham - Reference 94 - 31 dwellings**

See above.

**Chestnut Avenue - Reference 75 - 26 dwellings**

**Former overflow car park, Tesco - Reference 80 - 18 dwellings**

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.

**Land behind 66 Chudleigh Road - Reference 125 - 16 dwellings**

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?

**East of Pinn Lane - Reference 106 - 14 dwellings**

**Land at Hamlin Lane - Reference 60 - 13 dwellings**

**Fever and Boutique, 12 Mary Arches Street - Reference 100 - 10 dwellings**

**88 Honiton Road - Reference 110 - 10 dwellings**

**Garages at Lower Wear Road - Reference 84 - 9 dwellings**

**99 Howell Road - Reference 24 - 6 dwellings**

There is intensive mature tree cover on half of this site, which needs protection.