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Our Ref: PINS/Y1110/429/4
Date: 22nd November 2011

Dear Ian

**EXETER CITY COUNCIL CORE STRATEGY DEVELOPMENT PLAN
DOCUMENT: FINAL REPORT**

Thank you for your email of 18th November 2011, providing your comments in response to the fact check of the Inspector's report on the Council's Core Strategy DPD.

The Inspector has corrected the errors that have arisen and made the amendments to the report where appropriate, and I enclose your final report.

Yours sincerely

Chris Snarr

Plans and Major Casework Team





The Planning
Inspectorate

Report to Exeter City Council

by Jill Kingaby BSc(Econ) MSc MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 22 November 2011

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION OF EXETER CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 28 February 2011

Examination hearings held on 21, 22 and 23 June, and 24 August 2011

File Ref: PINS/Y11110/429/4

Abbreviations Used in this Report

AA	Appropriate Assessment
CIL	Community Infrastructure Levy
DPD	Development Plan Document
HQPT	High Quality Public Transport
HRA	Habitats Regulations Assessment
IC	Inspector Change
LDS	Local Development Scheme
LTP	Local Transport Plan
NPPF	National Planning Policy Framework: Consultation Draft July 2011
PC	Proposed Change from the Council
PPS	Planning Policy Statement
RS	Regional Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
SUDS	Sustainable Urban Drainage System
[CDxx]	Core Document number xx, from the Examination library

Non-Technical Summary

This report concludes that the Exeter Core Strategy Development Plan Document provides an appropriate basis for the planning of the City over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A number of changes are needed to meet legal and statutory requirements. The key amendments are summarised as follows:

- Change Policies CP1 & CP3, and the supporting text, to improve confidence that a 5 year housing land supply will shortly be achieved and maintained;
- Amend Policy CP1 to confirm that more than 12,000 dwellings will be sought over the plan period; and substitute a more detailed housing trajectory to show where and when this will be achieved;
- Amend Policy CP2 to encourage and incorporate business development across all sectors;
- Change chapter 11 to reflect the updated Infrastructure Delivery Plan and provide more certainty about developer contributions;
- Clarify the role of masterplans for implementation of the strategic allocations, and make allowance for further investigation before the location of sites for Gypsies and Travellers in Exeter is specified;
- Introduce greater flexibility into policies for affordable housing, to take account of economic viability, and to help stimulate housebuilding;
- Strengthen paragraph 10.44 to ensure that internationally important sites for habitats and protected species are properly protected.

Most of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. The changes do not alter the thrust of the Council's overall strategy.

Introduction

1. This report contains my assessment of the Exeter Core Strategy Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The Core Strategy Submission Document was written in February 2011. A Schedule of Minor Changes [CD84] was put forward by the Council shortly after submission, comprising factual updates, corrections of minor errors and other minor amendments in the interests of clarity. As stated at the opening of the Hearings, I have taken the Submission Document plus the Schedule of Minor Changes as the starting point for examination.
3. My report deals with the changes that are needed to make the DPD sound and they are identified in bold in the report. **(PC)** indicates changes which have been proposed by the Council and are presented in Appendix A. The changes that I recommend are set out in Appendix C **(IC)**. None of these materially alters the substance of the plan and its policies, nor undermines the sustainability appraisal and participatory processes undertaken. The Council's proposed changes in Appendix A have been subject to public consultation and I have taken the consultation responses into account in writing this report.
4. Other changes were also advanced by the Council after the Hearings. As these are minor and do not relate to soundness, they are generally not referred to in this report although I endorse the Council's view that they improve the plan. These are all shown in Appendix B. I am content for the Council to make any additional minor changes such as to numbering and spelling, and to update the information regarding the examination in paragraph 1.5 prior to adoption.

Assessment of Soundness

5. The plan was submitted for examination at a time when significant changes to national planning policy were being made or published for consultation. I sought the views of the Council and representors on the implications for Exeter's plan of the following:
 - The Government's intention to abolish Regional Strategies (RS) and the current status of emerging RS for the South West of England in view of legal challenges by Cala Homes;
 - Consultation on Planning for Traveller Sites;
 - Written statement, Planning for Growth, by the Minister of State for Decentralisation;
 - The National Planning Policy Framework: Consultation Draft (NPPF).

Whilst the NPPF is a material consideration, it is a Draft document and may change substantially following consultation. It therefore carries limited weight.

The Hearings also discussed the likely effect of a change to the definition of affordable housing in Planning Policy Statement 3: Housing (PPS3) Annex B.

Main Issues

6. Taking account of all the representations, written evidence and the discussions that took place at the Hearings, I have identified seven main issues upon which the soundness of the plan depends.

Issue 1 – Whether the plan's approach and structure is broadly consistent with national policy in Planning Policy Statement 12: Local Spatial Planning (PPS12), and with recent changes to planning policy.

7. The Core Strategy, or the plan, includes the vision in Chapter 3 to 'embrace its role in the region as an area of growth' whilst safeguarding its green and historic environmental assets and addressing the challenges from climate change. This appropriately encapsulates the challenge for the City in the future. However, the importance of Exeter, described in the Draft Regional Spatial Strategy for the South West (RS) as a Strategically Significant City, is understated in the plan. Its significance within the wider sub-region is a critical factor for future planning and development. The Council has put forward changes to the plan which address this satisfactorily **(PC1,2,3, 5-8)**.
8. Ten objectives are identified to support the vision and respond to key issues which are identified from a spatial portrait of the City given in Chapter 2. Whilst the ten objectives are rather general in form, the key issues are locally distinctive. The objectives are related to Exeter's Community Strategy, and relevant objectives are listed at the start of each chapter in the plan. The approach outlined in the early chapters is consistent with spatial planning and core strategies, as outlined in PPS12, and is sound.
9. PPS12 is clear that the delivery strategy is central for a core strategy. It should set out how much development is intended to happen where, when and by what means it will be delivered. Policy CP1 sets out the quantities of employment land, dwellings and retail floorspace which are to be provided over the plan period. It explains the extent to which the city centre, planned urban extensions at Monkerton/Hill Barton, Newcourt and Alphington, and the rest of the City, should accommodate this growth. The proposed distribution is in general conformity with the draft RS [CD98].
10. The key diagram usefully shows the city centre, strategic allocations and Exeter's landscape setting, among other things. The Council proposed changes to remove the Air Quality Management Area to a separate plan, to show the main road network and neighbouring local authority areas. I consider that these changes would provide a clearer picture of the city and the proposed strategy, and contribute to effectiveness **(PC35-37)**.
11. The Council commented in detail on the implications for the Core Strategy of the main points in the NPPF [EXCC029], confirming that the continued employment and housing growth in the City are essential to its and the sub-region's wellbeing. There is no conflict with the presumption in favour of sustainable development which both NPPF and Planning for Growth promote. As explained under Issue 2 below, the quantum of housing and the timing of development have been queried. There are concerns about the delivery of the

housing numbers. These questions are examined more closely below. However, I am satisfied that the underlying strategy for the plan is credible. It represents the most reasonable option for Exeter, has the support of neighbouring authorities and is in line with sustainability objectives. Section 13 of the plan sets out arrangements for monitoring and implementation. I conclude that the Core Strategy is broadly consistent with national policy, and comment on its consistency with detailed aspects and emerging/possible changes to policy below.

Issue 2 – Whether the plan takes a strategic and evidence-based approach and puts forward an appropriate and achievable level of new housing.

General Conformity with RS

12. Notwithstanding the Secretary of State's announced intention in 2010 to abolish RS, the recent Cala Homes court judgement stated that "*It would be unlawful for a local planning authority preparing, or a Planning Inspector examining, development plan documents, to have regard to the proposal to abolish regional strategies. For so long as the regional strategies continue to exist, any development plan documents must be in general conformity with the relevant regional strategy*".¹ The Regional Strategy for the South West of England, RPG10, however, was produced in 2001 and provides a broad development strategy to 2016. It is seriously dated and has negligible relevance to the determination of appropriate levels for housing and employment provision in Exeter to 2026.
13. The Draft Regional Spatial Strategy for the South West (RS) has reached an advanced stage of preparation with the Secretary of State's Proposed Changes published in 2008 [CD98]. Advice in paragraph 53 of PPS3 suggests that its housing figures should be accorded very significant weight. However, work on the emerging RS has ceased. For it to progress, more technical and administrative work would have to be carried out and it would need to be endorsed by the Secretary of State. There is no mechanism by which these can be done. There is, therefore, little prospect of the emerging RS becoming part of the development plan, which reduces the weight that should be given it for this Examination. Nonetheless, regard should be had to the evidence base which underpinned the emerging RS and consideration should be given as to whether it has been overtaken by more up to date information.
14. Following the Examination in Public into the RS 2006 document [CD97], the Panel proposed a figure of 12,000 dwellings for Exeter City, for the period 2006-2026 (600 dwellings a year) and Policy CP3 of the plan is in conformity with it. However, the Secretary of State's Proposed Changes to the Draft Regional Spatial Strategy, 2008 [CD98] increased the housing requirement for Exeter from 12,000 to 15,000. Reasons for the uplift, contained in evidence, included securing better alignment between job creation and housing

¹ the Court of Appeal judgment [Cala Homes (South) Limited v SoS CLG & ANR, 27 May 2011]

development, thereby reducing the need to travel, and taking account of the Exeter and Torbay Strategic Housing Market Assessment (SHMA) which indicated a very high overall demand and need for housing. Exeter's plan is not in conformity with the latest figure in the emerging RS of 15,000 new dwellings.

15. The Council contends that this level of growth cannot be achieved within the City. Its boundaries are tightly drawn, and studies support its view that further expansion is constrained by topography, flood plains and other landscape/environmental factors. Specific evidence to counter its claim that there was an element of double-counting in arriving at the 15,000 figure, in respect of the Area of Search 4A land at Newcourt and Monkerton, has not been submitted.
16. The Council has said it is committed to meeting as much of the sub-regional housing need as can reasonably be accommodated within the existing area. Policy CP3 refers to development of over 12,000 dwellings indicating a willingness to achieve a higher number. The plan makes no allowance for windfalls which is the correct approach, but windfalls especially long term could augment the housing numbers and bring them closer to those in the Draft RS. I conclude that, though the plan is not promoting a target of 15,000 dwellings, it supports the underlying principle of maximising housing provision within the City's boundaries. Changes to Policy CP1 and CP3, so that they seek at least 12,000 new dwellings, would reinforce the intended approach and help align the plan more closely with the draft RS **(PC4,9,12)**.

Five Year Land Supply

17. Strategic Housing Land Availability Assessments (SHLAA) were carried out in 2009 and 2010 [CDs 34 & 108] in accordance with the Department of Communities and Local Government Guidance, Methodology. The plan should refer to the 2010 SHLAA and the Council's proposed changes would do this **(PC10,13)**. The 2010 SHLAA concluded that the deliverable housing land supply, measured against the emerging core strategy target, had reduced. At the June hearing sessions, it was conceded that it was equivalent to only 2 years and 8 months. In view of the shortfall against PPS3 expectations, the Council reviewed the land supply situation in an adjournment to the hearings in July 2011. It was concluded that there was then 4 years and 7 months supply. These figures were not reviewed by an independent SHLAA Panel but were based partly on recent discussions with landowners or their agents to ascertain when sites would come forward.
18. Although this would not equate to 5 years, or meet a more stringent target for deliverable land supply as suggested in the draft NPPF, 4 years 7 months represents a significant improvement over the 2010 situation. It is significantly different from the 2010 SHLAA figure and has not been examined by the SHLAA Panel. However, especially in the current economic climate, significant changes in estimates of deliverable sites over short time periods are unsurprising. The economic downturn, with restrictions on available finance, has undoubtedly affected the numbers of sites being brought forward for housing development. Also, Exeter's plan is heavily dependent on new housing development on the proposed urban extensions which, because of their scale and complexity, will take time to deliver. The precise start dates

could be difficult to estimate.

19. As already stated, the plan makes no allowance for windfall sites. However, an appraisal of housing completions over the last 10 years showed that 220 dwellings per year were on such sites. Even in the last 2 years, when SHLAAs were carried out, windfall sites yielded more than 200 dwellings each year. If the trend continues, and there is no evidence to suggest otherwise, windfalls would more than make up the shortfall of 250 dwellings in the 5 year supply.
20. The updated estimate of 5 year housing land supply makes allowance for self-contained student accommodation in private developments. Paragraph 6.28 of the plan acknowledges that students form a significant proportion of the local population and are growing in number. Students will not all live on campus and will contribute to the demand for general housing. Concern was raised that the plan does not have sufficient regard for this future demand, which is not included in RS targets [CD26]. The Exeter and Torbay Strategic Housing Market Assessment Dec 2007 [CD23] found that recent growth at the University seemed unlikely to have had any impact on the general housing market, but the planned increases in student numbers could create pressures if not complemented by additional bedspaces in university accommodation.
21. The University of Exeter owns considerable land in the City and anticipates that most future student housing needs will be met in purpose built accommodation on and off campus. The Streatham Campus Masterplan Framework SPD and Supplementary Planning Guidance [CDs100f & g] indicate increases in the provision of purpose-built student accommodation and restrictions on the conversion of family/other household units to student accommodation in selected parts of the City. The forthcoming Development Management DPD should enable the Council to refine its approach to student housing appropriately. It is debatable whether or not the new privately developed student units should be counted towards Exeter's 5 year housing land supply. Clusters of self-contained accommodation, perhaps with individual studio units and a shared kitchen, should be counted in the housing supply, whereas communal accommodation (eg. traditional halls of residence) should not. More certainly, growing student numbers add to arguments for the plan to provide sufficient new land for housing for the next 5 years and secure the maximum housebuilding for the full plan period.
22. When the hearings resumed in August 2011, the Council put forward a Development Management Policy Statement². This commits the City Council to a number of actions to be proactive and boost the 5 year housing land supply. Though criticism was made of its late arrival, the statement's form and content were broadly supported by participants at the Hearing. It provides for a detailed appraisal of all land within the City boundary to re-assess the potential for housing development. Other measures include bringing forward Council-owned land and that of the County Council where

² It was agreed at the Hearings that the Interim Action Plan (EXCC 022) should be re-named the Development Management Policy Statement

- appropriate, and fast tracking planning applications for major development.
23. Policy 7 of the Development Management Policy Statement needs to be applied urgently and "*within the next five years*" would not be good enough. I consider that the plan should commit to an early review if a 5 year housing land supply cannot be demonstrated within the next two years at the most. Chapter 1 already refers to the possibility of an early revision of the plan. Paragraph 1.8 should refer to the possibility of an early review if a five year housing land supply³ is not established soon, and I recommend accordingly **(IC1)**.
24. Natural England queried the status of the Policy Statement and whether sustainability appraisal would be required. The intention is to speed up the delivery of housing in the early years, by bringing forward acceptable and suitable sites as soon as possible. It would not alter the overall targets for housing development in the plan nor the intended broad distribution of new development such that fresh sustainability appraisal would be needed. I am satisfied that the Policy Statement would not result in detriment to Exeter's internationally and nationally important environmental assets (notably the Exe Estuary). Change to the plan has been put forward to take account of the new Statement, which I shall recommend **(PC14)**.
25. I consider that the reference to the Policy Statement in PC14 demonstrates the Council's commitment to increasing the short term supply of housing land; the change goes some way to making the plan sound. I do not underestimate the seriousness of the shortfall in deliverable housing sites at the beginning of the life of this plan. Continuation of the pattern could undermine the authority of the Core Strategy. Instead of developing the best sites for housing in a planned fashion, the authority would be vulnerable to ad hoc development by way of paragraph 71 of Planning Policy Statement 3: Housing.

Medium and long term housing land supply

26. The urban extensions at Newcourt, Monkerton/Hill Barton and Alphington with the Regeneration Areas are expected to contribute more than half the target of 12,000 new homes by 2026, predominantly in the period 2015/2016 onwards. The Council proposed a change to the Housing Trajectory diagram in section 13 so that it would show the likely phasing of development of these schemes. Evidence from masterplanning and recently submitted planning applications supports the conclusion that the plan should deliver the required housing numbers in the later stages of the plan. The revised trajectory should provide a basis for managing and monitoring performance **(PC34 & App2)**.

Housing Mix and Policy CP5

27. The Council argued that Policy CP5 which seeks a mix of housing from all developments of 10 or more dwellings is aspirational rather than prescriptive, and includes an appropriate level of flexibility. Regarding Lifetime Homes

³ Regard should also be had to the Draft NPPF, para 109, or any revision of it

Standards, the Council seeks to reverse trends towards the provision of homes with small and restrictive internal space, and argues that the costs of providing new lifetime homes should be minimal. Currently, private sector investment in house building continues to be low and developers commonly face demands for contributions towards affordable housing and essential infrastructure, whilst having to build more sustainable homes. Market conditions, however, are expected to improve over the plan period, and the policy concedes that the Lifetime Homes Standard will be sought "*where feasible and practical*". I consider this to be suitably flexible.

Conclusion

28. With the changes above, I conclude that the plan takes a strategic and evidence-based approach and puts forward an appropriate and achievable level of new housing.

Issue 3 – Whether the plan will achieve the best possible contribution to the provision of housing for people who are unable to access or afford market housing; and whether the accommodation needs of gypsies and travelling showpeople (travellers) are adequately planned for.

Affordable housing

29. The SHMA identified a level of need for affordable housing that would not be met even if all new housing was affordable. Although the Council's housing waiting list may not equate with housing need, it has risen recently indicating that the situation is worsening over time. Policy CP7's target of 35% affordable housing on sites of 3 or more dwellings is underpinned by a viability study undertaken in 2009 [CD32]. An Independent Review of the study in 2010 [CD109] expressed some reservations but found the "appraisal principles and collective assumptions" to be "suitable" and a 35% high level target, as a clear starting point and expectation or "headline", "to be appropriately judged ...in viability terms". The Council observed that 35% is sought by the Draft RS [CD98 p6.1.8 and Policy H1] and by the neighbouring Mid-Devon authority.
30. The uncertainty about current and future market conditions and the availability of grant for affordable housing provision make the task of setting an overall (plan wide) target, as expected by PPS3, problematic. Notwithstanding the high level of need locally, if the target is set too high, there is a risk that every scheme will be an exception to policy. Then, unnecessary time and costs will be spent conducting viability assessments and negotiating an appropriate level of provision. The target of 35% will be challenging but, on the basis of the local evidence, it appears to be the most reasonable starting-point for affordable housing provision. The Council proposed change to Policy CP7 to make it more flexible in cases where viability considerations would prohibit the achievement of 35%. I have taken account of other suggested re-wording, but consider that the Council's amendment would make the policy effective and therefore sound **(PC17)**.
31. The threshold for affordable housing provision on developments with three or more dwellings is substantially lower than the national indicative minimum of 15 referenced in PPS3. The Independent Review Study commented on the practical challenges presented by some smaller sites [CD109, p5.1.10]. It

queried the extent of support in the earlier viability study for the full 35% affordable housing on all 3+ dwelling sites. The Council conceded that, if CIL were introduced in the future, providing affordable housing on some smaller sites could be unviable. However, it argued that the provision of affordable housing should be shared across the housebuilding industry. No other threshold has better evidential support which would enable it to be substituted in the policy. I therefore support the threshold of 3 dwellings as an appropriate starting-point for planning and negotiation.

32. A role for commuted sums on schemes of fewer than 5 dwellings was suggested, and change to the supporting text was put forward to permit this **(PC15)**. This should help to make the policy more flexible and able to deliver the much-needed housing, without compromising the aim of PPS3 for mixed communities.
33. On the requirement that at least 70% should be social rented housing, there is also concern about scheme viability, especially as this sector has been most grant-dependent. The Council pointed out that social rented accommodation is where the greatest level of need arises and, without substantial new provision, many people will not be suitably housed. In the absence of evidential support for another figure, Policy CP7 should retain the reference to 70% social rented housing. The Council proposed a change to paragraph 6.32 to emphasise that viability would be considered in applying the policy, and a flexible approach taken. The Government's recent change to the definition of affordable housing in PPS3, Annex B, to add "affordable rented" will widen the range of housing types. The proposed change to p.6.32 also reflects the definitional change, and contributes to soundness **(PC16)**.

Gypsies and Travellers

34. The Devon-wide Gypsy and Traveller Housing Need Assessment [CD27] carried out in 2006 informed the RS 2008 [CD98], and the figures for residential and transit pitch requirements 2006-11 are given in Exeter's plan (p6.29). Criticism was made that the estimate for additional residential pitches by 2026 stemmed from a projection of national rather than local growth in gypsy households. However, as the City Council has been unable to provide any new sites between 2006 and 2011, the longer term figures in Policy CP6 may be considered conservative. Insufficient evidence has been provided to demonstrate that the figure of 25 residential pitches is too high or that better figures are available.
35. The Government has recently issued a consultation document: Planning for Traveller Sites.⁴ This aims to give local authorities more discretion over need assessment, and ensure that collaborative working leads to fair and effective strategies. Proposed changes to national policy are at an early stage and the Council's approach does not conflict with the new document. Exeter City

⁴ This would remove the existing Circulars: Planning for Gypsy and Traveller Caravan Sites, and for Travelling Showpeople (C01/2006 & 04/2007),

participated in the countywide assessment [CD27] and accepted its findings.

36. The Council states that it has been searching for suitable gypsy and traveller sites over recent years without any success, although this has not been the subject of a publicly available report. In 2008, a call for sites from Government bodies, adjoining local authorities, local organisations, agents and members of the public yielded none. Whilst the proposals for sites to be found at Newcourt and Monkerton/Hill Barton have clearly proved unpopular with developers and local people, the Council pointed out that the Government's Good Practice Guide to Designing Gypsy and Travellers' Sites supports the inclusion of traveller sites in significant new build developments.
37. Paragraph 6.29 of the plan states that suitable sites will be identified through the strategic allocations and the Site Allocations DPD. This implies some conflict with Policy CP19 which seeks provision of 26 pitches in the strategic allocations. I shall recommend a change to Policy CP19 which would remove reference to the numbers of pitches (see paragraph 49 below) and this should give the Site Allocations DPD a stronger role in looking in greater detail at local need and identifying suitable sites over a wider area. I consider that more collaborative working and engagement of the stakeholders, including the local gypsy and traveller community, is needed to ensure that an appropriate level of provision is achieved on the best sites.
38. Concerning the criteria in Policy CP6, regard must be had for Annex C, Circular 01/2006, which reminds the reader that gypsies and travellers have the same rights and responsibilities as every other citizen. Plan policies and criteria should be fair, reasonable, realistic and effective, and written in a positive manner. I consider that the criteria in CP6 are satisfactory and sound. Overall, I conclude that, subject to the above-mentioned changes, the plan should make the best possible contribution to meeting the local needs for affordable housing and gypsy and traveller accommodation.

Issue 4 – Whether the Core Strategy sets out a clear economic vision and strategy for Exeter which positively and proactively encourages sustainable growth. Whether it plans properly for the growth and management of Exeter City Centre and other centres.

39. The success to date of the local economy in Exeter is described in summary in paragraphs 2.7-2.12 of the plan. Historic joint working with Devon County Council, neighbouring District authorities and the Growth Point Board is continuing to deliver the Science Park, new settlement at Cranbrook in East Devon and the urban extensions, among other things. The plan's Vision aligns well with PPS4: Planning for Sustainable Economic Growth. Objective 2 of the plan appropriately seeks to develop the potential of the City for further economic and commercial investment. The Council expressed its broad support for the aim to say 'yes' to development and growth, except where this would compromise the key sustainable development principles set out in

national planning policy.⁵

40. The Exeter Employment Study [CD15] which underpins the plan, foresaw a higher level of growth than was proposed in the Draft RS [CD97]. That Study preceded the recent economic recession, but there is significant evidence that Exeter has the potential and resilience to continue to grow. For example, it has made strides in establishing a knowledge-based economy with its Innovation Centre at the University, Science Park and Skypark to the east. There are differences of opinion as to the potential for the city centre to attract substantial modern office developments. However, since 2006, there have been around 20,000sqm of city centre office permissions and completions. I am satisfied that the plan will assist Exeter, with its broad economic base, to prosper and expand its city centre as well as other areas.
41. Provision of employment land in the Hill Barton and Newcourt area and in the south-west, where the urban extensions are proposed, is consistent with sustainable development. I accept that the references in Policies CP1 and CP2 to the Ibstock Brickworks in Pinhoe are too site specific for the Core Strategy and recommend that they are removed, in the interests of flexibility **(IC2)**.
42. Policies CP1 and CP2 make provision for employment land which reflects the quantities in the Draft RS, Policy HMA4 [CD98]. The suitability of land for employment development was assessed through the Exeter Employment Land Review [CD16] and this provides support for the plan. The Review identified that particular difficulties in providing employment land can be anticipated because of the relatively high value in Exeter of housing land. The Exeter Employment Study pointed out that some 55% of new jobs would not need Use Class B land (eg. retail, health and education, hotels). Although there remains a need to protect and add to good quality employment land, the underlying use changes warrant a degree of flexibility. The Council's proposed changes to Policy CP2 and to the Glossary would support this **(PC11,40)**.
43. Policy CP8, with its aim to maintain and enhance the vitality and viability of the City Centre and promote redevelopment of the bus and coach station, and to sustain a hierarchy of district and local centres, is consistent with PPS4. The Exeter Retail Study [CD17] was carried out during the economic downturn in 2008. The plan adopts the Study's more precautionary city centre growth recommendation, and paragraphs 7.12-13 advise that periodic review of forecasts should be undertaken. With Sidwell Street defined as part of the city centre, Appendix 6 lists the district and local centres appropriately.
44. Devon is an important tourist destination and the plan is fairly quiet about the tourist industry. However, Objective 4 seeks to provide and enhance retail, cultural and tourist facilities. The forthcoming Development Management DPD will update relevant policies in the Exeter Local Plan. The Exeter Hotel Study [CD75] identified a need for up to 741 new rooms 2006-2021. More than 300 bed spaces have since been provided in the city centre and an additional 310

⁵ Council comment on the recent Government statement, Planning for Growth.

are either under construction or have planning permission at Exeter Airport and Skypark within the study area.

45. The plan recognises the importance of the University to the local and sub-regional economy, at paragraph 6.28. In late 2010, the University of Exeter (Streatham Campus) Masterplan Framework was adopted as a supplementary planning document (SPD) [CD100g]. The University is expected to play a key role in establishing and developing the Science Park in East Devon. The plan includes sufficient references and is sound in its coverage of tourism and the University. Overall, the plan sets out a clear economic vision and strategy which positively and proactively encourages sustainable growth. It plans properly for the growth and management of Exeter's centres.

Issue 5 - Whether the identified strategic allocations are justified, and would be capable of being delivered.

46. The strategic allocations at Monkerton/Hill Barton, Newcourt and Alphington are planned urban extensions requiring a long lead-in time. Their development is central to the achievement of the Core Strategy. Plans 1 to 3 of the plan on Ordnance Survey bases show their boundaries, and the allocations fit the description of strategic sites in PPS12. The urban extensions, being in conformity with the draft RS and supported by evidential studies, are justified. Masterplans for Monkerton/Hill Barton and Newcourt were the subject of public consultation in early 2010 and screening for sustainability appraisal (SA) was carried out. Though SA for the masterplans was not considered necessary, the Core Strategy has been subject to SA.
47. Policy CP19 and paragraphs 12.13 and 12.18 expect development to be in accordance with the masterplans. However, section 5.6 of the Monkerton & Hill Barton Masterplan Study [CD61] illustrates the plan but advises that the fundamental principles for implementation may give other valid outcomes. I agree that the masterplans can only be indicative of final development. The Council has put forward changes to the Core Strategy which explain that the masterplans are to be applied flexibly **(PC30,31,33)**.
48. Policy CP19 provides details of the mix of uses proposed at each of the strategic allocations. At Monkerton/Hill Barton, it was queried whether a local or district centre should be sought. It was also argued that new community facilities along the Honiton Road frontage would be needed to serve 'Monkerton south'. The masterplan study reviewed options for a new centre (or centres) and I have insufficient evidence that Policy CP19 is inconsistent with PPS4 or out of line with Exeter's hierarchy of centres. Flexible application of the plan and masterplan should allow for appropriate provision of shopping and community facilities as the urban extension develops. Having regard for the Residential Design Guide SPD [CD100d], I am satisfied that family housing could be achieved on the strategic allocations at the densities proposed.
49. The provision of gypsy and traveller sites at Newcourt and Monkerton/Hill Barton is strongly opposed by some parties on the grounds that the proposals are not adequately justified, and have created uncertainty amongst prospective developers at Newcourt. It is claimed that the promotion of gypsy and traveller sites could prejudice delivery of the overall development. Large gypsy sites, it is argued, could have a harmful impact on neighbouring settled

communities. These issues need to be investigated further and dealt with collaboratively. The plan would enable such a process and be more flexible if Policy CP19 omitted the precise numbers of pitches. The need for suitable traveller sites is urgent, as none have been added in Exeter in the last five years, and total dependence on the Strategic Allocations could delay their provision. Potential conflict between the numbers in Policies CP6 and CP19 would be removed by the recommended change **(IC3)**.

50. Concern that Policy CP19 focuses too much on the amount of employment land required and fails to embrace the importance of encouraging a range of uses that would generate jobs is addressed by the Council proposed change to Policy CP2 **(PC11)**. I see no need for further amendment.

Infrastructure

51. Following a public inquiry related to a planning application for land off Hill Barton Road in 2011 (APP/Y11110/A/10/2137880), the Inspector observed that "The Council accepted .. that aspects of the masterplan remain unresolved; in particular, the identification of the necessary infrastructure, and the means of its provision and funding." The Council's Infrastructure Delivery Plan February 2011 [CD65] goes some way to meeting the requirements for good infrastructure planning in PPS12 (paragraphs 4.8-12). The Council has worked with Devon County Council and other service providers to identify items of infrastructure which are desirable, necessary or critical to deliver the plan. Needs and costs, phasing, funding sources and bodies responsible for delivery are identified. Each of the strategic allocations, and other areas, is covered.
52. After publication of the plan, the Council changed paragraph 11.11 [CD84] taking out a table of infrastructure projects and substituting a reference to its Infrastructure Delivery Plan [CD65]. In view of the evolving pattern of public funding availability, this was reasonable at the time. The Council presented a revised Infrastructure Delivery Plan in August 2011 [CD65A] to the re-convened hearing session. This updated the earlier document and indicates the mechanisms whereby developer contributions will be sought as either community infrastructure levy (CIL) or section 106 planning obligation. An amended key infrastructure table would reflect this additional work, and give a more effective plan and I support its inclusion, with the additional change regarding School Provision proposed by the County Council **(PC25 & App1)**.
53. The Council is currently preparing a CIL charging schedule, which would need to be examined prior to adoption. The preliminary work indicates the costs associated with different phases of the strategic allocations for residential development [EXCC027&028]. The revised Infrastructure Delivery Plan anticipates CIL's introduction and is designed to provide more certainty to landowners and developers as to what will be expected. It should provide a useful starting point for negotiations and I support the Council's changes to refer to it. I conclude that, subject to the proposed changes **(PC23-29)**, the identified strategic allocations are justified, and should be deliverable.

Issue 6 – Whether the policies for transport provide satisfactorily for the planned growth of Exeter, and are likely to deliver more sustainable travel patterns.

54. PPG13: Transport seeks integration between planning and transport. Strategies in the development plan and local transport plan (LTP) should complement each other, with allocations and local transport investment being closely linked. Chapter 8 of the plan explains the existing state of the transport network and infrastructure in Exeter, the challenges placed on them by planned growth, and measures to address the challenges as set out in the Devon Local Transport Plan. It describes joint working with the County Council (the highway authority), the Highways Agency and other stakeholders to assess the implications for the transport system of the City's growth options. The strategic developments at Monkerton/Hill Barton and Newcourt are sustainably located in that they are near to frequent service bus corridors and have rail lines through them, with opportunities to provide new stations.
55. PPG13 seeks to promote more sustainable choices for people and freight movement, reducing the need to travel especially by car. Policy CP9 seeks a step change in the quality, capacity and environmental performance of public transport, demand management measures, new rail halts and improvements for pedestrians and facilities. Transport Access Strategies have been produced for the strategic sites to consider measures to make the best use of existing sustainable travel opportunities minimising the use of the private car. This is considered essential in delivering LDF growth and managing congestion on a road network which is already nearing capacity. The proposed improvements to strategic road structure and park and ride provision were questioned as being too supportive of increased car usage. However, in view of the future need to transport higher numbers of people into the city centre as growth takes place, and to protect Exeter as a gateway to South West England, recognising the role of strategic road as well as rail corridors, these elements of the approach are justified.
56. Multi-modal modelling and public consultation findings predict that good levels of bus patronage, particularly between Cranbrook and the city centre, could be achieved through an enhanced bus system. The studies took account of earlier Government policy to support High Quality Public Transport systems (HQPT), which approach has been modified. Developer contributions have been secured in respect of Cranbrook, Skypark and Science Park developments providing some reassurance that contributions to enable bus enhancement elsewhere and serve the strategic allocations could be achievable. Local buses already have the technology for Smartcard ticketing, and this is to be introduced at the end of 2011. However, I see no need to specify this in the plan or to commit to a future orbital bus service.
57. Policy CP9 seeks additional Park and Ride sites, strategic road infrastructure improvements, and new rail halts. The Infrastructure Delivery Plan [CD65] and its August 2011 update assess individual schemes as critical, essential or desirable, identify key partners and costs, likely funding sources and timetables for delivery. Recent public sector reorganisation and expenditure cuts will undoubtedly affect progress on the projects, and the introduction of CIL will change funding arrangements. However, the Council has assessed the risks as far as possible, not finding any 'show stoppers'. It reports that items

are under continuing review, and the approach is consistent with good infrastructure planning.

58. The Highways Agency reports close working with Devon County Council which has secured public funding for improvements to M5 junctions in the recent past. It regards future improved M5 crossing capacity at Tithebarn Lane as critical, which is dependent on developer contributions.
59. Rail halts to serve the strategic sites have much public support and featured strongly in the LTP. Few technical or engineering problems have been identified though timetabling is likely to mean that the halt at Hill Barton would not be in place until 2026-31, potentially beyond the plan period. Newcourt should be the first in about 5 years time followed by Marsh Barton. Developer contributions would be required to implement the proposals and there is uncertainty over the process, ahead of an adopted CIL charging schedule. However, new rail halts would be beneficial to the planned development and the reference should be kept in Policy CP9. Policy CP19 should be amended to reflect the latest position **(PC32)**.
60. Proposals for Ide Park and Ride are at an advanced stage with a planning application under consideration at the time of the hearings. The LTP capital programme as well as developer contributions would fund it. Additional sites, notably to serve the A379 corridor and relieve the Matford site which is operating at capacity, are being considered. A park and ride site to serve South West Exeter may be identified within Teignbridge District. Given the success of park and ride sites in Exeter with a 75% increase in use over 5 years, their encouragement through the plan is appropriate.
61. Motor vehicle traffic levels in Exeter have remained unchanged over the last five years, whilst bus, rail and cycling usage have increased. The LTP recognises the importance of demand management and the need to raise awareness or provide incentives to promote active and sustainable travel [CD86]. The University's and the County Council's travel plans, and the latter's work with schools, as well as the City Council's restricted parking policies, demonstrate that measures to change behaviour are already in place. Policy CP9 should reinforce effective demand management. I am also satisfied that the plan has had sufficient regard for safety on roads and in car parks.
62. Overall, the Core Strategy is in line with the County Council's LTPs and positively promotes more sustainable transport patterns. The proposals for new infrastructure and improvements are closely related to the spatial strategy and intended levels of housing and economic growth. The plan has taken account of delivery, insofar as this is possible in times of economic uncertainty, and changes in public funding and planning policy.

Issue 7 – Whether the Core Strategy addresses community needs and facilities properly; whether it provides the best possible protection for the environment from climate change without stifling development, and provides appropriately for green infrastructure.

Community needs

63. The Core Strategy allocates a number of strategic sites in Policy CP17 which meet the criterion in PPS12 as being central to achievement of the overall

strategy. Development at Exeter Cricket Club would not be central to the plan and the acceptability or otherwise of enabling development to preserve and improve its sporting facilities would be too detailed and site specific to be referenced. The potential role of enabling development in supporting undesignated as well as designated historic assets is described in Planning Policy Statement 5: Planning for the Historic Environment (PPS5) and need not be reiterated in the plan⁶. A definition of community facilities should be added to the Glossary to provide clarity in implementing related policy **(PC39)**.

Sustainable Urban Drainage Systems (SUDS)

64. The Council's changes at submission stage introduced flexibility into Policy CP12 so that it is not too prescriptive or going beyond the advice in PPS25.

Low and zero carbon development

65. Policy CP13, concerning decentralised energy networks, is supported by the East of Exeter New Growth Point Energy Strategy [CD45]. I support the Council's proposed change to the plan to add a definition of decentralised energy networks to the Glossary **(PC38)**. The thresholds in the policy are based on modelling for the RS and reflect its Policy RE5 [CDs49 & 98]. The Council advised that developers of decentralised energy networks in UK generally ensure that their pricing is competitive (eg. by offering long term discounts) and that Ofgem which regulates the energy market would safeguard the interests of users. Hence, the policy should not conflict with paragraph 28 of the PPS1 Supplement. The policy is broadly consistent with paragraph 27 of the PPS1 Supplement, although de-centralised networks are not yet in place in Exeter. The third sentence of the policy gives some flexibility to ensure that necessary development would not be held back where connection would be unfeasible or unviable.
66. On using renewable and low carbon energy, the PPS1 Supplement requires an evidence-based understanding of the local feasibility and potential for such technologies to supply new development. Policy CP14 sets targets for large developments to exceed the requirements of the building regulations by at least 10%. The Council has a substantive, relevant local and regional evidence base which indicates that Exeter has one of the best solar climates in the UK and the South West has a significant bio-mass resource [CDs45-49].
67. However, these studies were carried out between 2005 and 2008 and the current viability of exceeding the national requirements set out in building regulations in Exeter has not been demonstrated. In view of the slowdown in sites coming forward for housing development, this is a serious matter. The Council changed Policy CP14 at submission stage to make its application more flexible. It was suggested that further change should be made to clarify what would be intended by "at least 10%" when zero carbon is the target. In fact, the policy states that viability and feasibility would then be considered. I am

⁶ PPS5, paragraph 7 and Policy HE11

satisfied that Policies CP13 and CP14 are sound. I support the Council's proposed change to Policy CP15 to remove the 'Code for Sustainable Homes' table, which may be overtaken by changes to national policy **(PC18)**.

68. Policies CP17 and CP19 refer to low and zero carbon infrastructure in the strategic allocations. I consider that the language used such as "aim to install" avoids being overly prescriptive. The Council put forward changes to Policy CP17 to address inconsistency between the proposals for Alphington, Monkerton/Hill Barton and Newcourt **(PC20-22)**. Subject to the above changes, I conclude that the plan should provide the best possible protection for the environment from climate change without stifling development.

Green infrastructure and landscape

69. Policy CP16 seeks to protect a number of defined areas for their character and local distinctiveness. The Exeter Fringes Landscape Sensitivity and Capacity Study 2007 [CD37] informed the policy, assessing all parts outside the built-up area of Exeter for landscape sensitivity and capacity for housing or employment. PPS7: Sustainable Development in Rural Areas opposes local landscape designations and believes that carefully drafted, criteria-based policies should provide sufficient protection without the need for rigid local designations that may unduly restrict acceptable, sustainable development.
70. Although the Council argued that PPS7 does not apply as Exeter is an urban area, CD37 includes discussion of this national policy document. I consider that the underlying principles of PPS7 are highly relevant to Exeter. Its role as a sub-regional growth centre requires it to make a step change in house building and accommodate growth in industry and commerce in the plan period. An overly protective approach to developing land on the urban fringe could stifle much-needed sustainable development, and should not be encouraged through unjustified local landscape designations.
71. At the practical level, the protection of the surrounding hills and valley parks has not been contested. The proposed urban extensions to the east and south-west on greenfield land indicate a willingness to promote the City's expansion. I am satisfied that the growth of Exeter is constrained by tight local authority boundaries, topography and sites of national and international importance for biodiversity, and that the approach in Policy CP16 has not restricted the search for suitable development sites significantly. Topsham Gap is the outstanding, contentious named area.
72. The Landscape Study did not associate the Topsham Gap with high landscape quality and sensitivity, but observed that it acted as a green wedge maintaining the identity and integrity of Exeter and Topsham. The concept of an area of separation between Exeter and Topsham clearly has local support. However, the extent of the designated area was criticised and the Council conceded that there were two sites within the Gap which it would reconsider in its search for housing sites. I see no justification for precise boundaries to the intended green areas to be defined in the Core Strategy. The policy and the Key Diagram identify broad locations.
73. The Royal Society for the Protection of Birds expressed serious concern with the submitted plan's treatment of the potential indirect impacts on the Exe

Estuary and East Devon Pebblebed Heaths Natura 2000 sites. Housing growth with high levels of recreation could impose pressure on these sites unless mitigation measures were identified, mechanisms to secure delivery and funding were put in place. These concerns reflect the conclusion in the Appropriate Assessment submitted under the Habitats Regulations [CD4]. Agreement between the Royal Society, Natural England and the Council was reached that paragraph 10.44 should be extended to give a higher profile to these matters. I support the change to make the plan effective in respect of protecting ecology and green infrastructure **(PC19)**.

74. Overall, with these changes in place, I am satisfied that Policy CP16 on green infrastructure and landscape is sound.

Legal Requirements

75. My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS March 2011 [CD10] which sets out an expected adoption date of November 2011. Even though this date will slip, the Core Strategy's content and timing have otherwise been compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2005 [CD7] and consultation has met its requirements. Consultation on the post-submission proposed changes was appropriate.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA) and Appropriate Assessment (AA)	The HRA report is dated July 2010 [CD4]. Four plan policies were identified as having potential for a significant effect on the European sites of Exe Estuary, Dawlish Warren, East Devon Pebblebed Heaths. With avoidance measures in place, however, the HRA concluded that there would be no adverse effects on the integrity of the European sites. A change to the plan ((PC19) see Issue 7) would help implementation of avoidance measures & monitoring of effectiveness, meeting the requirements of HR.
National Policy	The Core Strategy complies with national policy except where indicated and changes are recommended.
Regional Strategy (RS)	The South West of England does not have an up-to-date adopted RS. Under Issue 2 above, the relationship to the Draft RS is considered.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.

2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.
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Overall Conclusion and Recommendation

76. I conclude that with the changes proposed by the Council, set out in Appendix A, and the changes that I recommend, set out in Appendix C, the Exeter Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. And for the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Appendix B.

Jill Kingaby

Inspector

This report is accompanied by:

Appendix A (separate document) Council Changes that go to soundness

Appendix B (separate document) Council's Minor Changes

Appendix C (attached) Changes that the Inspector considers are needed

Appendix C – Changes that the Inspector considers are needed to make the plan sound

These changes are required in order to make the Core Strategy sound.

Inspector Change No.	Policy/Paragraph/Page	Change
IC1	Paragraph 1.8	Add a new second sentence as follows: ' <u>.....to revise the Core Strategy before 2026. In particular, the core strategy should be reviewed if the Strategic Housing Land Availability Assessments (SHLAAs) in 2011 and 2012 show a continuing shortfall of deliverable housing sites for the next five years, with any additional allowance to ensure choice and competition in the market for land, if up-to-date national planning policy requires it.</u> Whilst flexibility has'
IC2	Policy CP1 Policy CP2	(iv) providing a further 5.5 hectares of employment land to the north east of the City in the Pinhoe area, at Hbstock brickworks. <ul style="list-style-type: none"> • Around 5.5 hectares at Hbstock Brickworks in the Pinhoe area;
IC3	Policy CP19 Paragraph 12.17	For the Newcourt Area, change the third bullet to read <ul style="list-style-type: none"> • gypsy and traveller site provision to provide 13 pitches if necessary; Change the fifth bullet for the Monkerton/ Hill Barton area to read <ul style="list-style-type: none"> • A gypsy and traveller site provision to provide 13 pitches if necessary; Third sentence to read: ' <u>...and site provision for Gypsies and Travellers, if identified</u>

		<u>by the site search process.'</u>
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Appendix A Council Proposed Changes to the Core Strategy

Change Number	Paragraph Reference	Page No.	Amendment
1	Para 2.6	6	Add to final sentence 'With respect to the Exeter SSCT the strategy is to focus development within and adjacent to, the urban area and to ensure that population and workforce growth is commensurate with economic activity and growth in jobs and reducing commuting.'
2	Para 3.2 The Vision	13	Addition of the following text at the end of the paragraph (as a new paragraph): 'Exeter's strategic role will be enhanced by new housing and employment close to the city within the adjoining authorities. Significant new development will occur within East Devon including a new settlement and an urban extension to the east of Exeter.'
3	Para 3.8 Objectives	14	Addition of the following text to the end of the second bullet point in objective 1: 'supporting the delivery of new housing and employment in East Devon and Teignbridge including a new settlement and an urban extension to the east of Exeter.'
4	Para 4.1	17	Add more on the status of the regional strategy. Amend sentence to read: 'Levels of growth are informed by those set out in the Regional Strategy evidence base and by what the City Council feel can be accommodated within the environmental limits of the City.'
5	Para 4.6	18	At the end of Para 4.6 addition of text: 'but, the City council supports the Regional Strategy's vision for further development beyond its administrative boundaries'
6	Para 4.9	19	At the end of Para 4.9 addition of text: 'The City Council will work with neighbouring authorities and other stakeholders and seek to maximise the scale of sustainable growth at Exeter in accordance with the government's Pro-Growth agenda'
7	Para 4.11	19	After the second bullet point of Para 4.11 (after 'available;') add 'Development to the east of Exeter should extend beyond the city's administrative boundary and the City Council will work with all stakeholders to support joint working to achieve this'
8	Para 4.13	20	After Para 4.13 addition of text: 'The City council will support the proposals for urban extensions to the east of Exeter as set out in the draft East Devon Core

Change Number	Paragraph Reference	Page No.	Amendment
			Strategy. The Council will work with East Devon District Council and others to encourage early delivery of comprehensive mixed use urban extensions crossing the administrative boundary of Exeter and East Devon.'
9	Policy CP1: The Spatial Approach	20	Replace "approximately 12,000 dwellings" with "at least 12,000 dwellings" in the second bullet point.
10	Policy CP1: The Spatial Approach	20	Amend the following parts of the policy: 'Proposals are based on: (i) around 4,800 4,900 dwellings and around 20 hectares of employment land that are completed or have planning permission; (ii) promoting the City Centre as the sustainable heart of the City to include provision for: up to 30,000 square metres office floorspace on around 1.5 hectares of land, about 300 200 dwellings, and around 3,000 sq metres net retail convenience floorspace and up to 37,000 sq metres net retail comparison floorspace. (vi) bringing forward development in the rest of the City to accommodate around 2,000 1,800 dwellings.'
11	Policy CP2: Employment	27	Addition of text to policy CP2 after final bullet point: <u>'The release of employment allocations for other uses will only be acceptable where it can be demonstrated that development for an alternative use represents an opportunity that would create significant economic benefits for the city and the Travel to Work Area'</u> (new paragraph) 'The established employment areas at Southernhay, Matford, Marsh Barton, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained in employment use <u>except where their loss would not cause harm to business or employment opportunities or where there are unacceptable amenity impacts for local residents'</u> (new paragraph) Elsewhere, an alternative use may be acceptable where it is demonstrated that employment use is not viable or needed to meet current long term needs <u>or where there are unacceptable amenity impacts for local residents.</u>
12	Policy CP3: Housing	30	Update Policy CP3 with the latest figures (using the most recent SHLAA). Policy to read: 'The development of <u>at least</u> 12,000 dwellings is proposed as follows: Completions 2006-2011: 2,687, Planning Permissions: 2,224, Permissions subject to S106 agreement: 26, Identified sites within the urban area: 977, Regeneration Areas: 1,048, Newcourt: 2300, Monkerton/Hill Barton:

Change Number	Paragraph Reference	Page No.	Amendment
			2500, Alphington: 500, Total = 12,262'
13	Para 6.14	30	Amend to read 'The housing trajectory, based on the <u>2010 SHLAA</u> findings, and guidance on monitoring and management of housing delivery, is set out in section 13.'
14	Para 6.14	30	Addition of text at the end: 'The Council will adopt a Development Management Policy Statement to seek to maximise the delivery of housing land'
15	Para 6.30	35	Addition of 'or contributions' after 'provision' (the final and second to last sentence of the paragraph).
16	Para 6.32	35	Amend paragraph to: 'The HMA suggests that 31% of households seeking affordable housing in Exeter have an income that should enable them to access intermediate <u>and some affordable rented housing</u> . In general, <u>affordable rented and</u> intermediate housing requires fewer less subsidy subsidies to be provided by the developer or from other sources than social rented housing. However, people who can only afford social rented housing generally have the greatest current housing problems and, by definition, have very limited choice as to how to resolve them. It is considered, therefore, that the priority should continue to be focussed on those in greatest need, and a requirement that 70% of affordable housing should be for social rent is appropriate. <u>The council recognise that in some circumstances however the provision of 70% social rented may not be viable and subject to 'open book discussions' on viability the local authority may accept the provision of affordable rent units let so far as possible at social rental levels. The remaining balance should be provided as intermediate affordable housing. (new paragraph) The above is deemed appropriate to encourage mixed communities, maintain housing choice, prevent homelessness and benefit dependence and assist the Council to meet its statutory responsibilities towards people on the Housing Register.'</u>
17	Policy CP7: Affordable Housing	36	Amend policy to read: CP7: 'On sites capable of providing 3 or more additional dwellings (irrespective of the number of dwellings proposed) <u>35% of the total housing provision</u> should be made available as affordable housing for households whose housing needs are not met by the market. At least 70% of the affordable housing should comprise be provided as social rented housing. <u>The overall percentage of affordable housing and the tenure split will be</u>

Change Number	Paragraph Reference	Page No.	Amendment
			<u>subject to considerations of viability and feasibility. Where it is not possible for viability reasons to provide the full requirement of social rented housing affordable rent provision would be considered let as far as possible at social rented levels.</u> with <u>The remaining balance provided of the affordable housing should be delivered</u> as intermediate affordable housing.
18	Policy CP15: Sustainable Construction	54	Move the table to follow paragraph 10.29 and replace Code Level '6' 'with '5'
19	Para 10.44	57	Addition of text following paragraph 10.44: 'More specific work is underway to understand the effects of Exeter's and neighbouring authority's growth on the Exe Estuary, Dawlish Warren and Pebblebed Heaths. This will be completed as rapidly as possible and its conclusions used to inform the measures that are necessary to avoid adverse effects. These will be detailed in the Infrastructure Delivery Plan and secured through continued work with Teignbridge District Council and East Devon District Council. (new paragraph) The Council will work with Teignbridge District Council and East Devon District Council to adopt a mechanism to raise funds from relevant development to deliver the measures that are needed to avoid growth plans having an adverse effect on the integrity of sites and adopt a joint strategy to co-ordinate the collection of developer contributions and their spend on avoidance measures and the monitoring of the effectiveness of these measures in avoiding adverse effects. (new paragraph) The Council will work with TDC and EDDC to adopt a co-ordinated programme to monitor annually the effectiveness of the avoidance measures and the level of disturbing activities, drawing on evidence from RSPB, Natural England and other third parties. A review of mitigation measures will be necessary should monitoring indicate that measures delivered have not been effective.'
20	CP17 (i)	62	Replace "aim to install district heating and CHP as the low and zero carbon energy solution" with "aim to install low and zero carbon energy provision (for example, Combined Heat and Power (CHP))."
21	CP17 (ii)	62	Replace "aim to install district heating and CHP as the low and zero carbon energy solution" with "aim to install low and zero carbon energy provision (for example, Combined Heat and Power (CHP))."

Change Number	Paragraph Reference	Page No.	Amendment
22	CP17 (iii)	62	Replace "aim to utilize low carbon heat from the Marsh Barton Energy from Waste (EfW) facility" with "aim to install low and zero carbon energy provision (for example, Combined Heat and Power (CHP), such sources may include the Marsh Barton Energy from Waste (EfW) facility)."
23	11.8	66	Replace with: 'The Exeter Infrastructure Delivery Plan' draws on the Growth Point's Infrastructure Study to identify infrastructure requirements (see Appendix 2). It has been formulated in partnership with other authorities and stakeholders and sets out detailed arrangements for the provision of <u>infrastructure</u> '.
24	Para 11.9	66	Additional final sentence: 'The City Council will continue to work with identified partners in provision to ensure that delivery of those key items continues.'
25	Para 11.11	67	Re-insert amended key infrastructure table (See Appendix 1). Do not make CD84 (February 2011) minor change 33.
26	Para 11.15	68	Replace with: 'The City Council is working towards the introduction of a Community Infrastructure Levy (CIL). CIL allows local authorities to raise funds from developers undertaking new building projects in their area. Money from CIL can be used in combination with other sources to fund a wide range of infrastructure but it is anticipated that some forms of infrastructure will continue to be provided on site or through planning obligations'.
27	Para 11.16	68	Replace with: 'Further guidance on the implementation of Policy CP18 will be set out in the CIL Charging Schedule and its supporting documents and in an update to the City Council's Planning Obligations SPD.'
28	Policy CP18: Infrastructure	68	Replace 'prepare an infrastructure delivery plan' with 'keep an up to date infrastructure delivery plan'
29	Policy CP18: Infrastructure	68	Amend last sentence to read "Where appropriate, contributions will be used to facilitate the infrastructure needed to support sustainable development"
30	Para 12.13	70	Delete 'be in accordance with' and replace with 'The development of this area should have general regard to guidance contained within the Newcourt Masterplanning Study'
31	Para 12.18	71	Delete 'in accordance with' and replace with 'The development of this area should have general regard to guidance contained within the Monkerton and Hill Barton Masterplanning Study.'

Change Number	Paragraph Reference	Page No.	Amendment
32	Policy CP19: Strategic Allocations (ii)	73	Addition of 'Safeguarding' before 'the new rail halt on the Exeter to Exmouth line; and'
33	Policy CP19: Strategic Allocations (ii)	73	Deletion of last sentence: 'All three strategic allocations will be delivered in accordance with their respective Masterplans'
34	Housing Trajectory	94-95	Amend the housing trajectory (see Appendix 2).
35	The Key Diagram	96	Amend the key diagram to include the main routes into/out of the City
36	The Key Diagram	96	Produce a separate diagram of the Air Quality Management Area (AQMA)
37	The Key Diagram	96	Show adjoining authorities on the map
38	Glossary	109	Add a definition of Decentralised Energy Network. 'Decentralised energy network: a system of pipes and/or cables that connects a number of energy users in a locality to a locally generated supply of renewable and low carbon energy'
39	Glossary	108	Add a definition of Community Facilities. 'Community Facilities: Buildings or meeting places that provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.'
40	Glossary	109	Review minor change 38 (CD84) to the definition of Employment Land: 'All land and buildings which are used or designated for purposes within Use Class B1 (Business), Class B2 (General Industrial) and Class B8 (Storage and Distribution) and other uses of employment character or which generate substantial employment or economic benefits and which may include sui generis uses such as car showrooms.'

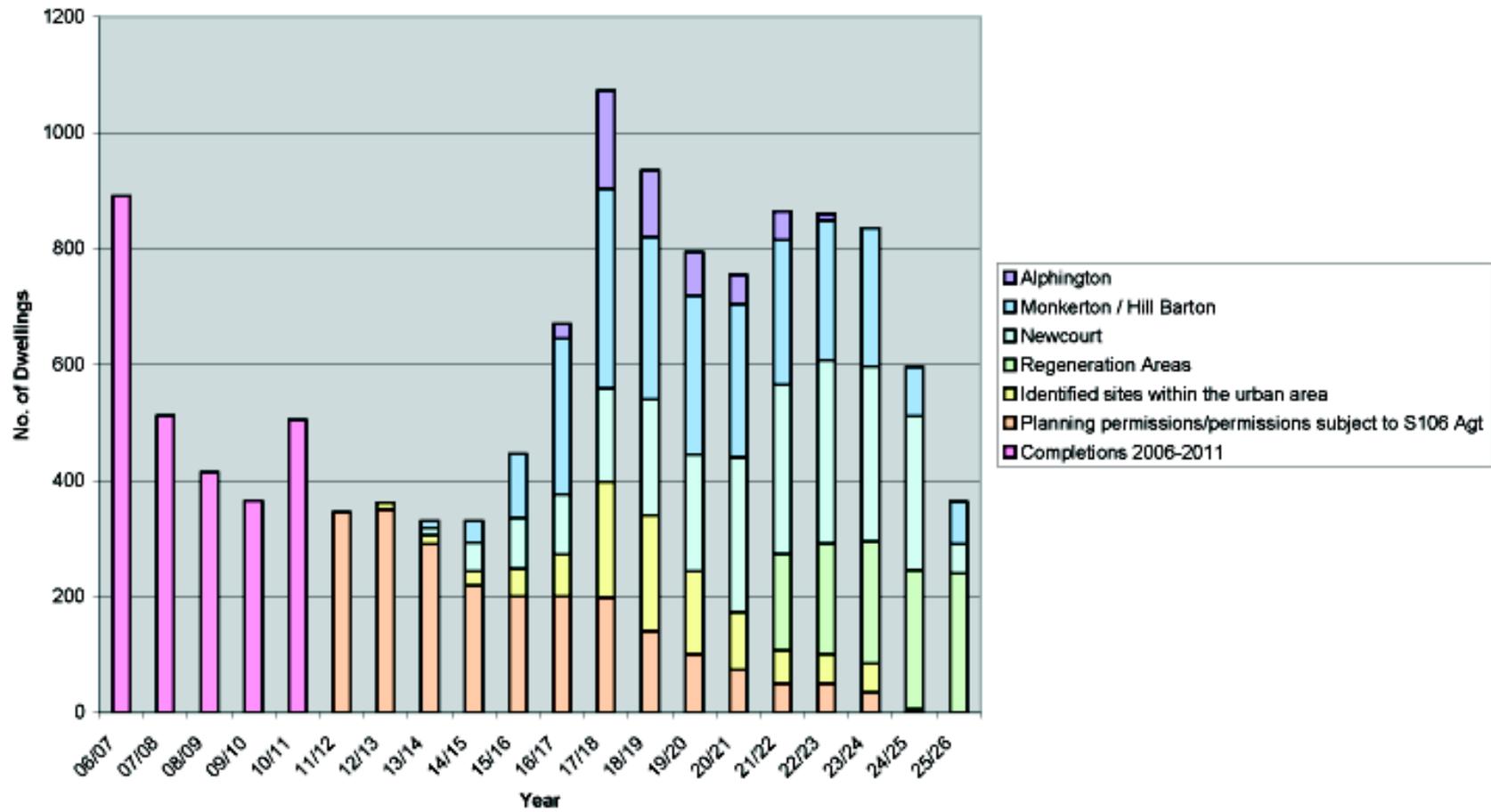
Appendix 1: Key Infrastructure Table

11.11

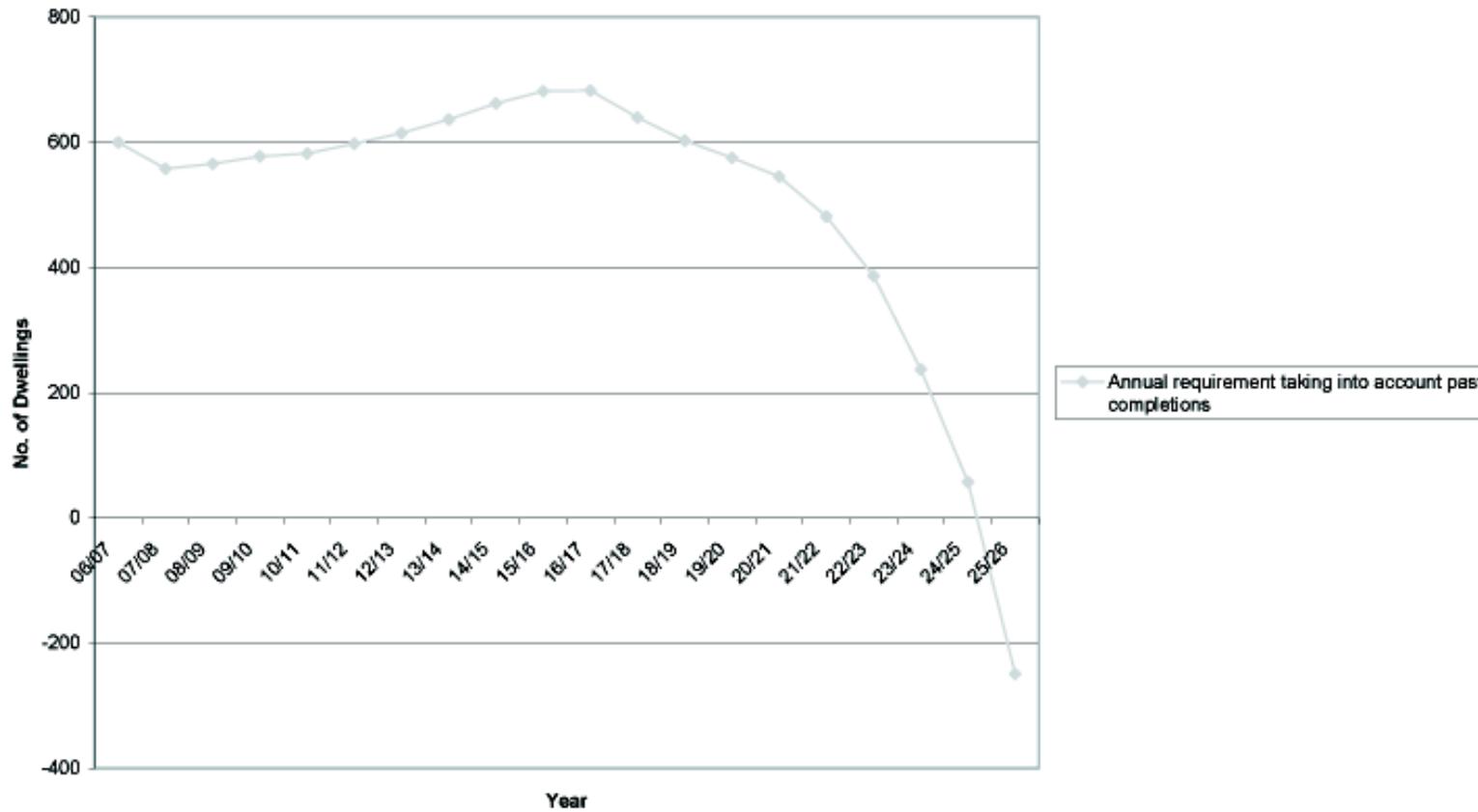
Infrastructure Need	Key partners in provision	Cost	Funding Sources	Timetable	Risk
Enhanced Public Transport Route between Cranbrook, City Centre and new development to the southwest	DCC, ECC, EDDC, Bus Operators, Developers	£2.5m	Developer Contributions	2011 – 2021	Medium Risk
M5 Jct 29 Improvements	DCC, Highways Agency, DfT	£14.4m	DfT (Central Government funding) and secured Developer Contributions	2011 - 2012	Low to Nil Risk
Expansion of School Provision	DCC	Approx 45m (plus land where indicated)	Developer contributions	2011 - 2026	Low to Medium Risk
Strategic Green Infrastructure route from Cranbrook into the City, to include a new pedestrian/ cycle crossing of M5 to north of J29	DCC, ECC, Highways Agency, DfT.	£5m (crossing)	DCC and Developer contributions / Direct provision	2011 – 2016	Pedestrian/ cycle crossing complete Medium risk for other elements
Provision of new Bus and Coach station	ECC, DCC	£6 m - £10 m	Developer Contributions / Direct provision	2012 - 2021	Low to Medium Risk

Appendix 2: Housing Trajectories

Exeter Core Strategy Housing Trajectory (Smoothed)



Annual dwelling requirement taking into account past completions (smoothed)



Appendix B Council's Minor Changes

Change Number	Paragraph Reference	Page No.	Amendment
1	Para 2.9	6	Replace 'English Nature' with 'Natural England' and delete 'Countryside Agency'.
2	Para 2.11	6	Amend to read 'In 2009/10 <u>2010/11</u> there were 12,768 <u>12,929</u> students across two campuses of whom 3,397 were post-graduates <u>full-time students living away from home</u> . It is envisaged that there will be approximately 4,700 <u>3,300</u> additional <u>full-time students, who are living away from home (ie. in Exeter)</u> by 2025/26.
3	Para 2.36	12	Add to final sentence: 'With the establishment of the Local Enterprise Partnership a Local Delivery Board has been established to provide a local delivery structure for the Exeter economy'
4	Para 4.4	18	Amend paragraph to read: 'Further work was done to establish the capacity for development within the city boundaries and this culminated <u>, culminating in the publication of the 2009 and 2010 Strategic Housing Land Availability Assessments (SHLAA) published in August 2009. The SHLAAs</u> This work also drew heavily on other studies such as the Exeter Fringes Landscape and Capacity Study published in February 2007 and the Strategic Flood Risk Assessment published in February 2008. The SHLAA work also involved assessment of the suitability and viability of potential development sites by a Panel of housing stakeholders. The conclusions of the 2009 SHLAA assessment broadly supports the elected members view that a housing requirement of

Change Number	Paragraph Reference	Page No.	Amendment
			12,000 can be accommodated within the environmental capacity of the City whilst 15,000 houses can only be accommodated by making assumptions about the number of sites coming forward as windfalls and by making assumptions about possible future locations for growth that are considered to threaten environmental limits. <u>The findings of the 2010 SHLAA reinforce this conclusion.</u> '
5	Policy CP2: Employment	27	Delete "12 hectares" and replace with "15 hectares"
6	Para 6.7	29	Amend the paragraph to read 'There are a number of previously developed <u>and greenfield sites</u> dispersed around the urban area that will contribute to meeting the dwelling requirement. These Previously developed sites become available when land is no longer required for its original use, or where the existing occupier chooses to relocate. The sites identified have been assessed carefully to determine their suitability for residential development and have the potential to deliver around 4,300 1,000 dwellings.' Do not add sentence on the end of Para 6.7 re: greenfield land, as proposed in Core Document 84 - Minor Change 12 (February 2011).
7	Para 6.9	29	Amend last sentence to read 'The Grecian Quarter has the potential to deliver around 250 200 additional dwellings'
8	Para 6.28	33	Amend to read: 'The University of Exeter had 42,768 students in 2009/10' <u>12,929 full-time students living away from home in 2010/11</u> and envisage that it will have approximately 4,700 3,300 additional <u>fulltime, living away from home</u>

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			students by 2025/26.'
9	Para 6.28	33	Delete 'and' from the final sentence and insert 'and the HMO (Use Class C4) SPD'
10	Para 6.28	33	Add "at sustainable locations at or near to major transport routes," before "or in the City Centre."
11	Para 6.29	34	Add "and deliverable" after "Suitable"
12	Policy CP9: Transport	44	Revise the final bullet point - delete "including a new crossing of the M5 to the north of junction 29"
13	Policy CP11: Pollution	49	Delete "shown on the key diagram" and replace with "shown on the following map"
14	Para 10.37	55	Amend 'lanscape setting' to 'landscape setting'
15	South West Nature Map	56	Provide a whole page set up for the map, and in colour
16	Para 12.4	69	Amend sentence from "Sustainable Urban Drainage Systems (SUDS) 'will be needed' to ensure the risk of flooding is minimised" to "Sustainable Urban Drainage Systems (SUDS) 'can be used' to ensure the risk of flooding is minimised"
17	Para 12.7	70	Replace 'Residential densities should reflect proposed locations with the highest density located centrally and along public transport corridors and lowest densities at the periphery of the site' with 'Residential densities should reflect site specific characteristics'
18	Para 12.14	71	Amend paragraph to read: 'The Monkerton/Hill Barton area should accommodate around 2,500 dwellings and about 5 hectares of employment land (in addition to 3 hectares with permission) set in a green infrastructure framework. The

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			residential development should be integrated closely with adjoining housing and be within convenient walking distance of <u>a primary school and community centre, and a local centre comprising a</u> primary school , a doctors surgery/polyclinic, local shops,'
19	Para 12.17	71	Delete "Densites" and replace with "Densities"
20	Glossary	108	Replace existing definition of affordable housing with the national definition in Planning Policy Statement (PPS3) Annex B: 'Affordable Housing: 'Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Affordable housing should: Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices. Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.'
21	Glossary	109	Add the updated definition of gypsy and travellers from the recently published draft planning policy statement. 'Gypsies and Travellers: Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding

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			members of an organised group of travelling showpeople or circus people travelling together as such'
22	Glossary	109	Add a definition of HMO as 'HMO: Houses in Multiple Occupation: Residential properties occupied by three or more unrelated tenants'
23	Glossary	111	Add a definition of Renewable and Low Carbon Energy (this is from the Draft National Planning Policy Framework): 'Renewable and low-carbon energy: Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass. Low-carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).'
24	Glossary	113	Add a definition of 'travelling showpeople' to be consistent with the updated and recently published draft planning policy statement. 'Travelling Showpeople: Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above'
25	Glossary	113	Update the definition of 'zero carbon' to reflect current government policy - 'Zero

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			Carbon: No carbon dioxide emissions from energy used through space heating and cooling, hot water, lighting, and building services as covered by the Building Regulations'