

25 January 2023

Exeter City Council
The Local Plans Team
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VIA EMAIL ONLY

Dear Local Plans Team,

Representation to the Exeter Community Infrastructure Levy Draft Charging Schedule

These representations have been prepared by JLL behalf of Blocwork LLP in respect of the above referenced consultation. These representations are submitted in respect of land at St David's which is allocated for development under Saved policy KP5 from Local Plan First Review 1995-2011 and is also identified in the Exeter Plan Outline Consultation document as a draft site allocation Red Cow/St David's (Site Ref. 22).

Blocwork LLP are looking to take forward proposals on the subject site to deliver an optimum density residential led mixed use development which includes station enhancements including a new multi-storey car park to meet current and future passenger needs. The residential component of the proposals is Build to Rent accommodation.

Blocwork LLP are currently in pre-application discussions with Exeter City Council in respect of the redevelopment of the subject site.

A summary of the representations submitted in respect of the current CIL consultation is outlined below:

- The introduction of new residential products, such as Build to Rent into the CIL charging schedule is welcomed.
- The emerging proposals at St Davids should be given CIL relief given that it will deliver a city-wide piece of infrastructure which can be viewed as being similar in nature to the purpose of CIL.

Planning Policy Context

It is understood that the primary context for the CIL partial review will be that of the current adopted local plan, as outlined in the supporting background information paper. Notwithstanding this, it will be important to also have regard to the emerging Exeter Plan, in the context of the St David's site given that the site allocation and associated infrastructure requirements is proposed to be retained in the emerging Exeter Plan.

Outlined below is an overview of the site allocation status/requirements for the subject site having regard to adopted and emerging policy.

Adopted Policy Allocation

Land at St David's Station is allocated for development under policy KP5 – Saved Policy from Local Plan First Review 1995-2011. Policy KP5 supports the mixed-use redevelopment of land at St David's Station for offices, student housing and retail along with public transport interchange facilities with buses and to provide improved cycle parking. The supporting text notes that in the long term there may be potential to achieve multi storey car parking and to release some of the existing car parking land for offices and further housing.

Emerging Policy Allocation

The existing site allocation in the Exeter Local Plan First Review is to be retained and expanded within the emerging Exeter Plan. The site allocation is being extended to cover the whole Red Cow Site.

Red Cow/St Davids (Site ref. 22) is to be retained as a mixed-use development allocation to provide a place to live and work. The draft plan outlines that development may include:

- Delivery of 430 net new homes
- High quality, high density and net zero carbon design that takes a strategic approach to flood risk mitigation, respects heritage assets and the amenity of neighbouring homes and ensures a healthy living environment for residents
- A mix of house sizes and types, including affordable housing, with low level car parking provision (for homes) supported by more sustainable transport measures including car clubs, e-bikes and improved pedestrian and cycle links to the surrounding area
- Highways improvements and the retention of car parking for the station
- A new local centre to the front of the station incorporating public open space, work spaces, shops, leisure uses and a new transport interchange that includes bus stops, taxi and cycle facilities
- Financial contributions towards local health and education services and utilities
- A net gain in biodiversity and funding for measures to reduce the recreational impact of development on the Exe Estuary and, where relevant, other nearby internationally important sites

Representations to CIL Consultation

Exeter City is consulting on a partial review of their adopted Community Infrastructure Levy (CIL). It is understood that the Council has decided to move forward with a partial review of CIL in response to changes and new products which have been introduced into the local property market. The revised CIL charging schedule will enable uses such as flatted development (for sale), flatted development Build to Rent, Co-living and Purpose-built student accommodation to be specifically considered and subject to CIL at the rates proposed. This will add new categories to the range of uses which will be liable for CIL and enable the specific requirements of uses, such as Build to Rent, to be considered, rather than being included within the wider “Residential” classification. This principle of this change is welcomed by our client.

As noted above, Blocwork are bringing forward proposals for the mixed-use redevelopment of the subject site which is to include inter-alia new rail user facilities including a new multi storey car park. Key to the development proposals will also be the creation of high-quality urban space and public realm to create an attractive gateway to the city.

The new rail user facilities, public realm and station enhancements will need to be made viable through the delivery of enabling type development such as new residential accommodation on land released from the development project. This is because the train operator company are the beneficiary of income generated by the existing car park, rather than Network Rail. To gain the support of the train operating companies to allow the release of land to support the proposals, the provision of an appropriate amount of car parking will be required to support current and future needs of the railway station.

The new multi storey car park is an important form of infrastructure which will support the city in terms of the ongoing operation of the station. Enhancing the rail user facilities at this strategic transport interchange can support a step change in the level of public transport use in the city to support the council’s aspiration to achieve Net Zero (as documented in the Exeter 2030 Plan prepared by Exeter City Futures).

The subject site is unique in that it will deliver a city-wide piece of infrastructure as part of the development, which can be viewed as being similar in nature to the purpose of CIL.

Our client is of the view that the subject site at St Davids should be offered relief from CIL given that it will be making a significant contribution towards infrastructure for the station which will be of city-wide importance and benefit.

The redevelopment of brownfield land often comes with development and viability challenges which are typically associated with abnormal costs. In the context of the subject site, there will also be site-specific infrastructure costs associated with the redevelopment of the site, namely the construction of a new multi storey car park. To avoid rendering the subject site unviable in light of cost burdens associated with the associated infrastructure, relief should be granted across the subject site to support the delivery of the proposed development which will bring with it numerous socio-economic and environmental benefits.

Our client requests to be notified of relevant updates in respect of the emerging CIL consultation. We also request the right to be heard at the subsequent Examination in public.

Yours sincerely,