

NEW EXETER LOCAL PLAN ISSUES CONSULTATION SUMMARY REPORT

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DRAFT

Exeter City Council

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1 Introduction

1.1 The New Exeter Local Plan Issues Consultation Document

- 1.1.1 This report provides a summary of the responses received to the Exeter Local Plan Issues document consultation. The issues document met Regulation 18¹ of the plan making regulations.
- 1.1.2 The Issues consultation document marked the first stage in the plan making process for the new Exeter Local Plan. The document² sets out a draft vision, a set of evidence-based initial issues, ideas which could shape the future pattern of development in the city, and a series of questions inviting comment on the content of the document.
- 1.1.3 This report will summarise responses to the consultation's six questions. More detailed consideration of the responses received will take place throughout 2022 and will feed in to the development of the Draft Local Plan.

1.2 Consultation

- 1.2.1 The Issues consultation document was available for public comment between 20 September and 15 November 2021. This eight-week period was two weeks longer than the statutory required minimum and the six weeks set out in the Council's Consultation Charter.
- 1.2.2 Responses to the six open questions raised were invited online through the website. The option to email responses was also available, along with the availability of paper copies at key locations or on request, plus other support as required.
- 1.2.3 The consultation was promoted through a number of means including:
- Regular inclusion in Exeter City Council's weekly e-newsletter (available through 'Stay Connected')
 - Two Covid compliant public exhibitions – city centre locations (Guildhall and Central Library), running daytime into evening to promote access
 - Email / post notification for all those included on Exeter City Council's planning policy database
 - Fully accessible online Issues consultation documents
 - Promotion through Exeter Connect and associated networks
 - Press release
 - Digital advertising screens at six locations throughout the city
 - Social media - Exeter City Council and other Exeter organisations, plus frequent reposting
 - Online video outlining the Issues consultation document

¹ [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

² [New Exeter Local Plan](#)

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- Posters (libraries, community centres, parks)
- Prominence on the City Council's webpage
- Copies of the Issues consultation document available in all of the city's libraries.
- Online Question and Answer webpage

1.2.4 It is considered that the consultation has been relatively successful in engaging with a range of respondents including the public, statutory consultees and those promoting development at an early stage.

1.3 Number of responses

1.3.1 In total, there were 215 responses to the Issues consultation. 169 of these were submitted online via the website, a further 45 were submitted via email and pdf, and 1 written paper response was received. During the consultation period, the New Exeter Local Plan webpage was visited over 1,300 times.

1.3.2 All six questions were open text questions. The number of responses per question, out of a total of 215, is outlined in table 1.

Question	Number of responses
1	154
2	170
3	150
4	154
5	153
6	153

Table 1: Number of responses to each question

1.4 Types of respondents

1.4.1 Of the 215 responses received, 161 were from individuals and 54 from organisations. Appendix 1 contains a list of the organisations that responded to the consultation. The number of responses by type of responder is presented in table 2.

Respondent	Number of responses
Individuals	161
Councils	3
Parish Councils	4
Government Agencies/ Public Bodies	10
Developers / Agents / Land Promoters	19
Other Organisations	18

Table 2: Types of respondents

2 Question 1: Do you have any comments on the content of the new Local Plan and its relationship with other plans?

2.1 Overview and broad themes

- 2.1.1 The intention of the Issues document was to provide a high-level overview of the proposed content of the new Local Plan and the main initial issues that have emerged through existing research.
- 2.1.2 Mentions of support for the overall content of the new Local Plan comprised of comments such as “broadly and at a high level, the plan makes sense”, agreement that the broad issues are covered, and that the plan seems sensible.
- 2.1.3 Some of the more critical comments received focussed on the lack of detail and policy wording, however this was not the purpose of the document. Others commented on the need for action and delivery plans to ensure the aims are met, or referred to specific single issues such as students and student accommodation, transport, and anti-social behaviour.
- 2.1.4 Other broad themes that emerged in response to this question were the importance of green and open space, nature and biodiversity, as well as reiterating the emphasis on the climate emergency, and commentary in favour and support of brownfield development. The need for evidence based policies and timely delivery of infrastructure were often mentioned. A desire to focus on sustainable growth and ambition to become a thriving city rather than considering growth in terms of size and economic prosperity was also commonly set out.

2.2 The Local Plan’s relationship with other plans

- 2.2.1. In terms of the relationship of the Local Plan with other plans, often mentioned was the need to dovetail with adjoining and nearby Local Plans and Neighbourhood Plans (both the St James Neighbourhood Plan and those in adjoining areas). In terms of the relationship with the wider sub-region, some identified the need for a coherent strategic overview covering a wider geographical area beyond the city boundary. There were a number of responses that made specific reference to the Greater Exeter Strategic Plan (GESP) and request for a renewed consultation on this prior to the development of the new Exeter Local Plan despite the GESP no longer being pursued. This was acknowledged by others who instead pushed the importance for full engagement and alignment with neighbouring authorities through the Duty to Cooperate in place of GESP.
- 2.2.2 The relationship between the Local Plan and Liveable Exeter, and the Exeter Place Board was queried.
- 2.2.3 Comments were made requesting the Development Plan structure be kept ‘simple and easy to follow’.

2.2.4 Respondents mentioned the following policies and strategies as suggestions the Local Plan should include and / or align with. The Local Plan will also draw links to a myriad of policies and strategies that extend beyond this list.

- Exeter Transport Strategy - Devon County Council
- Cycling and Walking Infrastructure Plan
- Transport Infrastructure Plan
- Devon Climate Emergency plans and strategies
- Net Zero Exeter 2030 strategy
- Cycle Infrastructure Design guidance (LTN 1/20)
- Clyst Valley Regional Park strategies
- Adjacent Local Plans
- St James Neighbourhood Plan and adjacent Neighbourhood Plans
- Conservation Area Appraisals and Management Plans
- Policies on energy distribution and usage
- Policies on water usage and sewage management
- Cultural Strategy 2019-24
- Clear Streets Charter
- Building Exeter Back Better
- Liveable Exeter Vision document
- Air Quality Strategy
- A new heritage strategy
- Natural England Nature Recovery Strategies
- Parks and Greenspace Strategy
- Trees and Woodlands Strategy

2.3 Extended responses to Question 1

2.3.1 Question 1 asked for comments on the overall content of the Local Plan which prompted numerous responses of varying degrees of length and detail covering the full range of issues people felt should be addressed in Exeter. The comments largely centred on the ten issues put forward in the Issues document, and responses to these are presented more fully in section 3. Community engagement and policy delivery were two additional topics that emerged in this section. The themes raised are set out below:

- Homes
- Climate emergency and net-zero carbon
- Infrastructure
- City centre and high streets
- Natural environment
- Health and wellbeing
- Economy
- Community engagement
- Historic environment and culture
- Development and design
- Policy delivery and enforcement
- Transport

3 Question 2: Are these the main issues facing Exeter? Are there any issues which we should change, add or remove?

3.1 Overview and broad themes

3.1.1 The Issues document included ten initial issues which could shape the Local Plan. The issues were identified using existing evidence and knowledge gained from previous local plans and the Greater Exeter Strategic Plan. Question 2 asked for feedback on the ten issues. The ten issues identified were:

- Climate emergency
- Health and wellbeing
- Homes
- Economy and jobs
- The future of high streets
- High quality places and design
- Historic environment and culture
- Natural environment
- Sustainable transport and communication
- Infrastructure and community facilities

3.1.2 170 responses were received to question 2 which included over 30 clear expressions of broad agreement with the issues identified.

3.1.3 Comments often tended to focus on the need for up to date evidence-based policies and figures, more detail on each issue, comment on the summary wording, and concern about the scale and location of development. This detail is due to come forward in the next draft of the new Local Plan.

3.1.4 A key general theme was the need for greater emphasis on the crosscutting and interlinked nature of the issues, and not to view them as distinct issues in isolation. Others questioned whether the issues were in priority order. The issues are not listed in priority order and are recognised to inherently relate to one another. They are intended to provide structure for this document, and potentially the Local Plan.

3.1.5 In terms of the delivery of these aspirations, comments on various limitations and absence of a budget and clear delivery plan within the document were made. The need for a monitoring and annual reporting system was also raised, along with effective enforcement.

3.1.6 Community engagement was another key issue raised in response to this question and throughout the survey. This related to the inclusion of individuals, communities, cultural organisations and small businesses in the Local Plan process and in planning more generally. Engagement also referenced meaningful participation, discussion with 'hard to reach' groups, the difficulty of people to engage with this consultation meaningfully without additional understanding of planning, and to ensure voices are heard. Much of this relates to the Statement of Community Involvement, a document which

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was consulted on at the same time as the Local Plan Issues consultation and which will be the subject of a separate report to Executive.

3.1.7 With regard to issues that could be added, the following were all raised, either as missing, or requiring greater emphasis and priority:

- Homelessness
- Urban sprawl and new housing developments conflicting with the aim to protect green space and the environment
- Quality of school education
- Street drinkers
- Keep / build sense of existing neighbourhoods and communities as well as new
- Play and spaces for children and young people
- Student accommodation / student numbers / community imbalances
- Infrastructure and community facilities to be suitable for those with vision and mobility issues / Clear Streets Charter – consider disabled users
- Lack of green space
- Commuters
- Arts and culture
- Top quality digital broadband infrastructure
- Sustainable Growth / inclusive growth / green growth / all should be able to make sustainable and healthy choices
- Duty to Cooperate
- Viability of development
- Displaced uses to be accommodated elsewhere in the city
- Racism
- Diversity and inclusion / equality – leave no one behind / vision for unskilled workforce / all protected characteristics should be explicitly covered in all areas
- Water management / water pollution
- Farmland / farming and food production / food sovereignty
- Ecological / nature / biodiversity crises
- Heritage-led regeneration
- Housing types and tenures: Key worker housing, range of affordable housing, older persons', second homes, holiday lets
- Public transport as a standalone issue
- Local centres, not only the High Street
- Traffic / reduction of car ownership and usage
- Focus on climate resilience not zero carbon
- The vital role of retail to the functioning of local communities
- Light pollution
- Better management of Houses in Multiple Occupation applications / revision of Article 4 direction
- Flood risk
- Energy production and consumption
- Accountability, transparency and democracy in all decision making

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- Challenges posed by ageing population
- Rapid introduction of kerb side glass collection and food waste collection
- Street safety
- Temporary housing for domestic abuse
- Clean air

3.1.8 One respondent suggested the economy and jobs issue be removed on the basis that there are enough jobs and no evidence more are needed. There were no other suggestions to remove any of the issues in terms of the future work on the Local Plan.

3.2 Climate Emergency

3.2.1 Responses that related to the Climate Emergency issue ranged from commenting positively on this emphasis and on zero carbon to calling for greater prominence of this through embedding and underpinning every element of the new Local Plan, and the decarbonisation of transport and housing. Sustainable growth was also identified as of paramount importance, along with a parallel and simultaneous need for climate change mitigation and adaptation for health reasons as well as carbon reduction. However, carbon zero policy implementation was identified as having potential to affect viability and prevent housing delivery. It was also suggested that the Local Plan should aim to be carbon positive by the end of the plan period (2040) as it runs beyond the Council's commitment to be carbon neutral by 2030 and should present greater challenge.

3.2.2 A number of issues were raised regarding carbon reduction:

- Issues arising from queuing traffic
- Set energy generation targets that are challenging to developers not traded to minimal levels
- Ban student cars
- Promoting the night time economy generates unnecessary travel and over consumption and is not consistent with zero carbon agenda. Promoting smaller venues (theatres / small cinemas / restaurants) throughout the city to reduce travel
- Support for home owners with houses that are not energy efficient
- Limits on wood burning stoves and open fires
- Electric Vehicle (EV) charging policy – EV charging points to be provided by the developer

3.3 Health and Wellbeing

3.3.1 It was frequently expressed that this section needs to be expanded as the summary text doesn't encapsulate the extent of health and wellbeing. The contribution of homes, parks and open spaces to wellbeing, and need to reduce inequality were most frequently cited. Calls were made for the section to be more holistic, going beyond physical health to include building communities, social connectivity and local identity. Also raised was the need to recognise that everything contributes to health and wellbeing and for

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systematic integration of this through embedding health in place, collaborating with other agencies to consider the impact of planning on healthcare, designing out crime and reducing the need to travel.

3.3.2 Inclusion of access to green spaces and nature, and the role of heritage were raised as essential to wellbeing alongside being more active, improving air quality and providing quality housing. Some raised the loss of fields and green space as detrimental to wellbeing.

3.3.3 Other comments regarding potential amendments include:

- To work with organisations to understand the implications of planning policy on healthcare
- Provision of churches in housing developments due to their role in wellbeing and community connectivity.
- Incorporate Sport England's Active Design principles into masterplans
- Play areas and delivery of creative and safe spaces
- Reduce noise at night and from high decibel vehicles
- Taking a 'health in all policy' approach to allow for planning decisions to be made taking into account public health
- Food – restrict the density of takeaways
- Antisocial behaviour
- The benefits of nature to health and wellbeing
- Developer contributions for a full range of health facilities
- Promoting the night time economy is not consistent with health and wellbeing
- Developing places free from crime and the fear of crime

3.4 Homes

3.4.1 A significant number of comments related to homes, the appropriate provision of affordable housing, placing restrictions on housing to retain accommodation for local people, and a proactive plan for the ageing population. In addition, delivering homes that provide for wellbeing through size, price and green space was mentioned. Negative comments regarding the number of new homes and scale of development were also presented. This included the need to justify and evidence the housing requirement, in terms of overall numbers and types of housing.

3.4.2 In terms of the potential location of development, the following comments were often raised:

- Maximise brownfield development
- Protect green spaces and Valley Parks
- Avoid floodplains
- Locate development to reduce the need to travel

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3.4.3 Others provided related comments such as:

- Query as to whether Exeter is able deliver development needs within boundary
- Remove blanket 'no development' to the north of the city

3.4.4 In terms of types of housing, the need for the following was raised:

- A range of tenures, housing products and affordable housing
- Gypsy and traveller sites
- Key worker housing
- Specialist older persons' accommodation
- Covenants to retain affordable housing in perpetuity
- Regulation of holiday lets and second homes
- Limit student accommodation / shared living / co-living

3.4.5 Comments on the design of new housing included the following:

- No development that isn't carbon neutral
- Focus on reducing pollution to waterways
- Deliver infrastructure and community facilities first
- Understand the need for denser housing but include decent outside space including roof gardens and green walls
- All new homes to be built to at least Passivhaus standard
- Build housing to last
- Build housing with climate change mitigation in mind
- Consider work/life by ensuring all new homes have a dedicated work space and developments have a community work space
- To update and include previous Design Guide biodiversity requirements within the Local Plan
- Build to rent should be subject to minimum size and quality standards, CIL and affordable housing contributions
- Need to ensure healthy indoor home environments

3.4.6 Other concerns were raised regarding potential difficulties bringing forward homes on large urban brownfield sites and the risk that climate emergency policies could pose to viability.

3.5 Economy and jobs

3.5.1 Comments made on this issue predominantly related to a shift in focus towards inclusive and sustainable growth, the green economy, or the potential need for no growth if we are to commit fully to sustainability. Responses also explained the focus on the local economy, independent businesses and mutual funding organisations.

3.5.2 Other economy and job related comments covered:

- The growth and creation of neighbourhood centres outside of the city centre / High Street

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- The need to consider the travel to work area when creating jobs
- The need to consider the loss of employment land with regard to brownfield sites
- The lack of mention of care jobs
- The opportunity to get involved in the UK space industry
- The importance of making use of world-renowned experts at the Met Office and the University

3.6 The future of high streets

3.6.1 Support for other 'high streets' outside of the city centre, local centres and independent businesses was often mentioned. The concept of the '15 minute neighbourhood' whereby residents have access to amenities within a 15 minute walk or cycle was also frequently raised.

3.6.2 A number of respondents reiterated the need for a diverse and functional city centre. The document refers to leisure, culture and the night time economy, but it was suggested that this needed to be balanced with retail and residential use and improvements for all residents as development, leisure and the night time economy appear geared towards young people and students. Similarly, concern regarding drug and alcohol related noise, antisocial behaviour, poor health, and deterioration of the appearance and safety of various city centre locations was expressed.

3.6.3 Other comments for consideration with regard to the future of high streets were:

- Access to the city centre
- Safety of women at night
- Pedestrianisation of the High Street for safety / better public space
- Protect and enhance the historic character of the city centre
- Keep cafes, tearooms and small independent shops open into the evening
- Creating places for women
- The impact on retail and the city centre if car parks are lost

3.7 High quality places and design

3.7.1 Responses suggested an overriding agreement with the need for good design and the wide reaching positive influence this has. Various design-related suggestions were made:

- The importance of trees in terms of urban design, shade and the provision of well connected, attractive green spaces
- The need to design streets to be safe and obstacle free for those with impaired sight and disabilities
- The need for the Local Plan to take advantage of the opportunity available to safeguard green spaces, wildlife and the wellbeing these spaces provide
- The need for the Local Plan to include polices to enable refusal for poor design and the means to ensure that developers adhere more closely to relevant Masterplans

3.7.2 With regard to high density development and height, responses were mixed. Some requested policies to set out high density expectations, others remain concerned about the scope for provision of allotments and green space within high density development, and some express concern about high rise developments not being in keeping with Exeter's character, or respecting the heritage or landscape and the need for strict height limits in policy. Further comments on high density development and height were raised in response to questions 4 and 5.

3.7.3 Other design related points raised included the need for:

- Cycle infrastructure standards
- Tree planting
- Climate change adaptation
- Rainwater soakaways
- National design standards
- Permeability throughout developments
- Nature rich spaces to be at the heart of everything
- Consideration of the visually impaired
- Provision for appropriate waste segregation to support sustainable waste management
- Creation of networks of local neighbourhoods with strong identities and economic opportunities through design
- Support community resilience

3.8 Historic environment and culture

3.8.1 In addition to comments proposing that arts and culture should be standalone issues and that culture shapes all places and underpins all other issues, there was a degree of questioning as to what was meant by culture. There were queries about whether this was referring to cultural heritage, cultural facilities or intangible cultural heritage. There was also a call to provide for cultures of minority groups in the city and to help address racism and deliver theatres and music venues to rival nearby cities. The Exeter Cultural Strategy which calls for arts, culture and creativity to be embedded in all aspects of planning was often mentioned as a means of achieving this, potentially through adoption as an SPD.

3.8.2 With regard to the historic environment, the need to protect and enhance Exeter's heritage and historic natural features was strongly represented, along with using heritage to inform development. In order to do this, comments included requiring architecture to reflect the surrounding historic area, prioritising heritage-led regeneration, making use of heritage places and spaces for tourism and wellbeing, updating conservation areas and associated management plans, and acknowledging the irreplaceable nature of heritage assets. It was requested that the term 'historic assets' be replaced with 'heritage assets'. The potential to develop the Roman Baths under Cathedral Green to generate tourism was suggested. However, some felt that Exeter's rich historic environment has been destroyed.

3.9 Natural Environment

- 3.9.1 Throughout the survey, the protection of the natural environment was identified as being of paramount importance for many. This was demonstrated by comments regarding the need for gardens, green routes, landscape consideration and a 'wild-belt' around the city. Comments were also made that there should be categorically no development in the Valley Parks and the hills to the north and that the Local Plan should explicitly protect these areas in perpetuity to build a network of strategically connected green spaces around the city. However, a small number of respondents presented the argument that if housing need is to be met, the Valley Parks cannot be protected.
- 3.9.2 While it was commented that it was good to see emphasis on the climate and ecological emergency, others were concerned that the ecological and biodiversity crises weren't mentioned. This was raised through the need to refer to the Devon Local Nature Recovery Strategy and Nature Recovery Network, and biodiversity net gain, and review the Habitats Mitigation Strategy.
- 3.9.3 Further suggested ways to enhance the natural environment included using developer contributions towards nature recovery, to integrate biodiversity and nature in all developments, and continue and build upon the relationship with Devon Wildlife Trust.
- 3.9.4 Other considerations raised with regard to the natural environment included the potential to:
- Set an ambition to become a pesticide-free city
 - Protect and enhance the water environment
 - Update landscape evidence and the Green Infrastructure Strategy
 - Reference the interrelationships between the natural and historic environment
 - Provide allotments and food producing land
 - Rewild parts of the city

3.10 Sustainable transport and communication

- 3.10.1 Transport was frequently cited due to the multifaceted issues associated with all forms of transport commonly experienced by residents. It was reiterated that the Local Plan will need to refer to Devon County Council's Exeter Transport Strategy and associated evidence base, and that transport needs to be transformed. Comments focussed on limiting the number of cars, especially the most polluting, while also accounting for access for those with disabilities in terms of parking provision, and recognising not everyone can walk or cycle. The provision, reliability and price of public transport was often criticised and identified as a barrier.
- 3.10.2 In relation to communication there was a call for top quality digital broadband infrastructure, and a suggestion that a reliance on an increase in digital to overcome transport problems will not suffice.

3.10.3 Comments that related to active travel included:

- The need to account for those unable to use active travel
- Exeter's topography as a barrier
- A desire for low traffic neighbourhoods
- Annoyance at cycle paths conflicting with walkways
- Connecting cycle routes to new development and surrounding countryside
- The need for a cycle route linking Cowley / St David's / city centre
- To make cycle lanes safe for riders of all ages
- The need for electric bike clubs / provision
- The potential benefits of uncluttered pavements
- The benefits of shade along active travel routes

3.10.4 In relation to public transport:

- Improvements to rail welcomed but buses considered to have the biggest influence in reducing the number of cars
- The potential for green buses / fossil fuel free buses
- The need for safe transport for women
- The importance of a public transport strategy
- The need for a reassessment of the potential for free bus passes to be means tested
- The benefits of a Cowley Park & Ride
- The potential for a tram linking St Thomas, High Street, Sidwell Street and a coordinated light rail system covering Seaton, Tiverton, and Torbay
- The requirement for bus and rail links with Exeter's rural hinterland
- The need to reduce the cost of public transport to dissuade people from using cars

3.10.5 In response to cars and other road traffic there were comments regarding:

- Concerns about electric vehicles
- A need for more electric charging points and accessible and easy car sharing points
- Electric vehicle charging points taking up pavement space
- Using planning to discourage car use
- Allocating land and using policy for last mile freight transfer depots to reduce HGVs in the city
- Providing clarity on the longer term plan for city centre car parks
- Parking provision for disabled, car share and visitors
- The need for adequate parking, particularly on new developments

3.11 Infrastructure and community facilities

3.11.1 The delivery of infrastructure to support new homes is often cited with reference to the apparent limitations of current infrastructure. In addition to the overriding themes that infrastructure needs to be delivered up-front, should deliver a greener future and should take the form of 'hard'

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infrastructure as well as social and community infrastructure, the following points were also raised:

- Nature rich green spaces should be acknowledged as community facilities
- Include provision of police infrastructure
- The importance of sustainable energy infrastructure
- The need for the full spectrum of health care facilities
- The importance of shops being provided alongside development
- The importance of community consultation for infrastructure delivery
- Support for inclusion of Pinhoe Community Hub as essential infrastructure

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4 Question 3: Do you have any comments to make on this vision for the new Local Plan?

4.1 Overview and broad themes

4.1.1 Of the 150 responses there were many in support of the vision covering a variety of themes including sustainability, green infrastructure and health.

4.1.2 However, this question raised the most queries with regard to terminology and the relevance of themes to a planning document. For example, queries were raised regarding:

- What 'analytical city' means
- The definition of 'growth' and the need for it to be sustainable recognising physical and ecological boundaries
- The meaning of 'innovative and analytical city'
- The relevance of world class education to a planning document
- The meaning of 'creating new communities'
- The distillation of seven key elements of the vision
- The different components of culture

4.1.3 Of those critical of the vision, there was concern about elements of the vision and issues contradicting one another. There were also queries about the limitations of the city, City Council and scope of planning to achieve some of the aims due to national legislative restrictions and the cross boundary, national and global nature of many of the issues. This related to the suggested need for greater collaboration with other authorities regarding housing on the boundary of the city and associated issues.

4.1.4 Of those who felt that the vision contained contradictions, it was also claimed that this left the vision weak, and loose and subjective. Further comments included:

- 'Building great neighbourhoods' needs more work to actually deliver
- The vision needs to be more ambitious if Exeter is to be a leading sustainable city
- The focus is on growth when it should be net zero
- The vision should be prepared and refined with constant involvement of stakeholders and landowners if it is to not fail

4.1.5 The monitoring of the vision was also queried, along with how the vision would become reality.

4.2 Proposed amendments to the vision

4.2.1 There were a number of responses proposing suggested amendments to the vision which included adding reference to the crosscutting nature of issues, and reordering to amend priority moving away from a focus on growth. This predominantly suggested a shift towards sustainability, net zero and wellbeing underpinning everything else.

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4.2.2 While some felt the vision needs to be more concise, various issues were also felt to be missing from the vision:

- Education / qualifications
- Infrastructure delivery
- Wellbeing
- The need for a healthy and inclusive city based on the principles of sustainability
- Antisocial behaviour
- Support for rough sleepers / homelessness
- Waste reduction and recycling
- Focus on children and young people
- Urban design
- The need for greater emphasis on culture
- Road improvements
- Delivery of more greenspace
- Zero carbon given further priority
- Greater priority given to nature
- Wider focus on the connected city region
- Meeting the city's housing needs
- Key element should be sustainable growth
- Heritage
- Importance of true mixed use
- Diverse neighbourhoods
- Homes not housing
- Farmland to feed Exeter
- People with lower incomes
- Feeling safe / low crime
- Healthcare infrastructure

5 Question 4: Do you have any comments on the ideas which could shape the future pattern of development in Exeter?

5.1 Overview and broad themes

- 5.1.1 With regard to shaping the future pattern of development, support came through for all of the ideas presented, particularly the development of previously developed land, protection of the Valley Parks, surrounding hills and unique skyline. There was also support for the garden city principles, the focus on the city centre and other existing centres, and active travel. The delivery of infrastructure and for development to deliver sustainable communities and 15-minute neighbourhoods was also strongly presented along with development to be shaped first and foremost by climate change adaptation.
- 5.1.2 Concern was raised about “sustainable urban extensions”, what this means and why sustainable urban extensions are required in the context of the Liveable Exeter programme which is understood to negate the need for such developments. Similarly, the height of proposals and high density development were queried due to the potential for conflict with other aims such as environmental protection and good design.
- 5.1.3 Other comments referred to specific sites and site considerations, the need to work collaboratively on cross boundary issues and development on Exeter’s boundary particularly with regard to pressure on roads and services and urban sprawl.
- 5.1.4 Other themes similar to those raised in previous questions were again mentioned in answering question 4. These included zero carbon, energy efficient homes, climate change adaptation, a need for a balance of development in relation to student accommodation, transport issues, commitments to green spaces and repurposing the high street. There were also specific suggestions such as a marina, a park linking the High Street and the quay and converting Riverside Valley Park to an international standard water sports arena.

5.2 The natural environment and pattern of development

- 5.2.1 A significant number of responses in this section related to the protection and provision of green spaces and the natural environment which has crossover with Question 5 on the quality of development. There was mention of meeting Natural England’s Accessible Natural Greenspace Standard for England as a minimum, and a need to strengthen the protections of landscape setting, and ridgelines, and safeguarding the heritage of designated landscapes.
- 5.2.3 Fewer respondents, usually those promoting sites, put forward that there should not be ‘blanket bans’ in certain areas such as to the north and in Valley Parks, also suggesting that greenfield development will have to be considered to meet housing need.

5.2.4 Further comments relating to the natural environment and both the pattern and quality of development included reference to:

- Using the Local Nature Recovery Strategy to guide future development and drive nature recovery
- Steering away from other important areas for wildlife (Valley Parks, ridges and valleys to south)
- Avoiding development around the Exe Estuary
- Screening development with trees when it can't be resisted
- Delivering gardens throughout
- Keeping public areas and parks
- Providing food producing areas as well as green and outdoor spaces
- The 'value' of the Exeter fringes
- The retention and inclusion of green space and biodiversity
- The protection of high-grade agricultural land

5.3 Brownfield development

5.3.1 There was strong and relatively consistent support for development to be predominantly or exclusively on brownfield land although comments didn't often extend beyond reiterating general support. One response advised maximising brownfield land opportunities and robustly assessing whether constraints can be overcome to bring them forward. Another raised the issue of reusing and repurposing buildings before building development on greenfield sites.

5.3.2 Concern regarding brownfield development was raised with reference to:

- The role of brownfield land as nature corridors and areas of biodiversity value
- The potential loss of city centre car parks due to the associated economic consequences
- The potential loss of archaeological potential

5.4 High density

5.4.1 Higher density development, particularly on brownfield land, was recognised as being the preferred option to accommodate development needs. Positive responses to high density development focused on the city centre and close by, particularly when accompanied by green infrastructure and open space. However, some responses stated that an uncompromising focus on green infrastructure and open space could limit strategic sustainable development, hindering the best use of land in more sustainable locations.

5.4.2 Concern about high density proposals centred on two main themes- green spaces and personal outside space, and the height of buildings.

6 Question 5: Do you have any comments on the ideas which could shape the future quality of development in Exeter?

6.1 Overview and Garden City principles

6.1.1 As with all questions there was a degree of support for the ideas set out in the issues document that could be used to positively shape the future quality of development.

6.1.2 Carbon emissions, embodied carbon, climate change, energy efficient homes, changes to travel, use of recycled building materials and refurbishing and repurposing rather than new build came through as a strong and common focus. This was accompanied by protection, enhancement and inclusion of greenspace, nature, biodiversity and heritage.

6.1.3 Comments relating to the quality of development reiterated and reinforced the positives of referring to Garden City principles which were put forward in the document as ideas to help shape the quality of development.

6.1.4 A series of comments suggested expanding upon the Garden City principles by:

- Retaining and protecting Exeter's natural and historic environment and locally distinct heritage
- Promoting quality design taking into account national design codes
- Considering climate change/zero carbon as the priority
- Making greater reference to the natural environment: biodiversity net gain, nature led development, strategic greenspace, protection and delivery of trees and hedgerows
- Nurturing local communities
- Protecting distinctive development local character
- Delivering infrastructure prior to development
- Providing active travel options to link to and include Public Rights of Way and to making these safer and more accessible

6.1.5 Criticisms of Garden City principles included that the principles are included in national design codes as suitable and standard for all developments not only Garden Cities. A definition of the term 'garden city' was requested as it is perceived that the term is used to justify mass house building on green sites at odds with the original Garden City movement.

6.2 Other comments

6.2.1 Various responses relating to the quality of development echo comments made to previous questions covering various topics. These identified the need for/to:

- 15-minute neighbourhoods
- Decent green space
- Cultural facilities / new theatre
- Reducing antisocial behaviour

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- Limits to student housing (purpose built student accommodation and HMOs)
- Tackle homelessness
- Low carbon / Passivhaus standards
- Safe active travel options
- Reduce inequality / rebalance health inequality
- Greater resident involvement in decision making
- Mixed use developments
- Ensure that higher buildings do not contribute to the loss of views
- Focus on what children and young people want from spaces
- Green / living walls and roofs
- Prioritise re-using and repurposing existing buildings over building new

Draft

7 Question 6: Are there any further comments you would like to make on the Exeter Local Plan?

7.1 Overview

- 7.1.1 The majority of responses and text provided to this question reiterated the themes and topics raised throughout this report including affordable housing, infrastructure delivery, the natural environment and nature, net zero, growth, the impact of student accommodation, local economy and independent businesses, culture and delivery of a new cultural venue, public transport, travel routes and traffic.
- 7.1.2 Responders also used this question to express thanks for providing the opportunity to comment, while numerous organisations stated that they welcome and look forward to continued discussion and involvement in developing the Local Plan

7.2 Delivery of the Local Plan

- 7.2.1 The need to ensure the delivery of the Local Plan, querying how it will translate to reality and how to ensure that developers adhere to the Local Plan, were all raised.
- 7.2.2 Questions regarding the location of development and the delivery of Liveable Exeter sites were raised while details regarding the promotion of sites were provided by landowners and developers. No new site submissions were received through this consultation. Sites previously submitted will be reviewed through the Housing and Employment Land Availability Assessment (HELAA) which forms part of the Local Plan evidence base.
- 7.2.3 While factors that need to be considered with regard to potential development sites were raised throughout the survey and this report, the following suggestions were specifically provided when answering question 6:
- The need to consider the Aerodrome Safeguarding area of Exeter Airport to ensure that there are no adverse impacts that could compromise aircraft safety or aerodrome operations
 - The need to ensure that development does not conflict with the Water Framework Directive objectives and where possible employs mitigation measures for impacts on waterbodies
 - The benefit of the Local Plan in recognising the role of housing associations in providing affordable housing and the need for engagement with housing associations
 - The need for the Local Plan to be in accordance with marine plans where relevant
 - The potential benefits of a heritage strategy (Historic England)

7.2.4 In terms of developer contributions and CIL, the following points were made:

- The need for developer contributions and CIL money to bridge the funding gap that exists in providing additional police infrastructure that is required directly resulting from new/planned development
- The need to consider how policies on net-zero carbon and sustainability could impact development viability and the ability to provide affordable housing in Exeter
- The suggestion that the plan should consider the current standard of flood risk infrastructure provision and the future requirements for maintenance and upgrades (Environment Agency)

7.3 Consultation and participation

7.3.1 While there were many who expressed thanks for the opportunity to comment and encouragement to keep the consultation going throughout the Local Plan process there were others who called for greater promotion of such consultations and greater active participation. The inclusion of young people and children in consultation was also suggested. Consideration of the language and 'jargon' used, a need for a definition of terms and the requirement for more detail to enable more meaningful consultation responses were identified.

7.3.2 In addition to consultees and organisations inviting discussion as policies and the draft Local Plan develop, others mentioned making use of collaboration with local groups and designers and architects in the process.

7.4 Other comments

7.4.1 The question invited any comments and therefore the breadth of these was extensive. Those not included previously in the report are summarised in the list below:

- The opportunity for Exeter to develop its built environment as an exemplar of sustainability with a strong Devon identity and the potential to use the design review process to achieve this
- The potential to develop further travel choice at the Park and Ride sites as interchange hubs
- The noise impact of traffic and air transport
- Concern over housing numbers, house building and the impact this has on communities
- The need for more emphasis on renewable and possible hydro power on the river
- The need to acknowledge the role of the River Exe more fully
- The importance of the accessibility of Exeter and its facilities for those in surrounding areas, many of them reliant on private transport
- The potential for the plan to support cargo bikes for local deliveries

8 Conclusion

8.1 Overview

8.1.1 This report provides a summary of the responses received to the New Exeter Local Plan Issues document consultation. It intends to provide a summary of the feedback. More detail will be provided in a full consultation statement which will be provided with the Draft Plan to identify in more depth how the responses have been used in the preparation of the Plan.

8.1.2 The Issues document intended to provide a high-level overview of the proposed content of the new Local Plan and the main initial issues that have emerged through existing research. Consultation sought feedback through asking six open questions, and as a result there was a significant degree of overlap between responses to the questions. Issues that were raised as important in response to all questions were:

- The importance of green and open space, nature and biodiversity
- Sustainable growth
- Reiterating emphasis on the climate emergency
- Support for brownfield development
- Timely delivery of infrastructure – community as well as ‘hard’ infrastructure
- The importance of supporting neighbourhoods
- Support for local centres as well as the High Street
- Support for the local and green economy
- The need for a range of housing types and tenure, and truly affordable housing
- The importance of Exeter’s heritage
- Greater recognition of the role of culture
- The need for evidence based policy
- Sustainable and active travel, with provision for those unable to utilise active travel modes
- High quality design

8.1.3 While responses picked up the nuances of the content, and at times requested greater emphasis and detail on various topics, it would appear that the issues raised in the document capture those most relevant to Exeter and its communities, in the context of a Local Plan.

8.2 Next steps

8.2.1 The consultation responses will be used alongside evidence on a range of topics to shape a draft of the new Local Plan to be consulted on in later 2022.

8.2.2 The timetable for preparing the new Local Plan is below:

- Draft plan consultation: September 2022
- Publication: February 2023
- Submission to Planning Inspectorate: June 2023
- Examination hearings: October 2023
- Adoption: June 2024

Appendix 1: List of organisations that responded to the Issues consultation

Councils

1. Devon County Council
2. East Devon District Council
3. Plymouth and South West Devon

Parish Councils

1. Colaton Raleigh Parish Council
2. Exminster Parish Council
3. Whitestone Parish Council
4. Woodbury Parish Council

Government Agencies / Public Bodies

1. Designing Out Crime – Devon and Cornwall Police
2. Devon and Cornwall Police
3. Environment Agency
4. Historic England
5. Marine Management Organisation (MMO)
6. National Highways
7. Natural England
8. Network Rail
9. NHS Devon Clinical Commissioning Group and Royal Devon & Exeter NHS Foundation Trust
10. Sport England

Developers / Agents / Land Promoters

1. Christian Leigh Chartered Town Planners
2. Heynes Planning Ltd
3. McMurdo LPD on behalf of Grenadier Estates
4. McMurdo LPD on behalf of Stuart Partners
5. McMurdo LPD on behalf of private clients
6. McMurdo LPD on behalf of private client
7. McMurdo LPD on behalf of private client
8. Nash Partnership
9. Persimmon Homes
10. PCL Planning on behalf of Waddeton Park Ltd, Vistry and Taylor Wimpey
11. Savills on behalf of Telereal Trillium
12. Savills on behalf of private client
13. Savills on behalf of W J Channing & Sons (Woking) Ltd
14. Stantec on behalf of Taylor Wimpey UK Ltd
15. The Planning Bureau Limited on behalf of McCarthy Stone Retirement Lifestyles Limited and Churchill Retirement Living
16. Turley on behalf of Bloor Homes South West and Stuart Partners Limited
17. Walsingham Planning on behalf of Land Promotion Group
18. Walsingham Planning on behalf of ALD Developments
19. Walsingham Planning on behalf of Vistry Group

Other Organisations

1. Devon Archaeological Society
2. Devon Countryside Action Forum
3. Devon Wildlife Trust
4. Exeter Airport
5. Exeter City Living
6. Exeter Civic Society
7. Exeter Cycling Campaign
8. Exeter Green Party
9. Exeter Hindu Community Centre
10. InExeter
11. Montagu Evans on Purple Investment Management LLP (owners of Princesshay Shopping Centre)
12. Progressive Group of Councillors on Exeter City Council
13. RSPB (Royal Society for the Protection of Birds)
14. Southbrook Community Association
15. Tetlow King South West Housing Association Planning Consortium
16. The Woodland Trust
17. University of Exeter
18. Women's Equality Party, Exeter Branch