



**Exeter**  
City Council

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Devon County Council  
Environment Group  
County Hall  
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**Our ref:** Devon Climate Assembly  
**Your ref:**  
**Date:** 27 January 2022

Dear Doug

### **Reference: Devon Climate Assembly**

Thank you for allowing Exeter City Council to respond to the Devon Climate Assembly report. It resulted in a healthy response from elected members and officers. Please find a collective response, with some response to specific actions and some general comments.

### **General Comments**

Elected members and Officers from the City Council applaud and welcome the work undertaken by the Devon Climate Emergency team in bringing together citizens on the Devon Climate Assembly, and the process undertaken. It is important we all digest the Devon Climate Assembly report, implement proposed actions and report back publicly on progress made and the outcomes made as a result of the actions implemented.

The Net Zero Exeter Plan 2030, researched and authored by Exeter City Futures, has been adopted by Exeter City Council. The City Council is a partner of Exeter City Futures along with Devon County Council, the RD&E, The University of Exeter, Exeter College and Oxygen House. Exeter City Futures is focused on delivery and working with partners to address the technical, financial and policy obstacles that obstruct delivery of net zero, as well as exploring opportunities to work with the private sector on investment propositions.

The importance of clear policy decisions in helping shape delivery plans is acknowledged and welcomed by the City Council. The desire to reduce cars in the city centre is established in the Exeter City Centre Vision document of 2011 and in the Liveable Exeter Strategy, which was informed by the Devon Transport Strategy for Exeter. The City Council is seeking to develop on some of the city centre car parks and to prioritise pedestrians on important through routes such as Paris Street. There are practical challenges associated with reducing car parking and deterring cars from entering the city centre ahead of improvements in alternatives, including park and ride, park and change and increased rail and bus capacity.

Exeter serves a large catchment area for retailing, hospitality, culture and business; the provision of city centre parking is important for business, and losing spaces in an unplanned manner would be harmful to city centre businesses and the wider economy. Reducing city centre car parking provision is clearly the direction of travel, therefore we need to accelerate the transport solutions that support people traveling into the city from our surrounding catchment and travel to work area.

Exeter City Futures is working on matters that are not in the control of local authorities, such as delivering retrofit solutions, where only 4,000 of the 40,000 housing stock of Exeter is in the control of the City Council. Work undertaken by the City Council on retrofitting our housing stock provides a basis to inform and learn from. Transferring learning at scale to the wider housing stock requires developing a financial mechanism that will learn for the previous initiatives tried by Government.

The City Council welcomes this level of discussion on renewable energy generation, especially community energy networks. Renewable energy generation needs to look wider and include solar, off-shore wind, water (tidal, rivers and reservoirs) and district heating.

The outcomes of the Devon Climate Assembly on transport are particularly welcome as this is a highly contentious issue, our (national) culture and current policies promote car use. Due to the rurality of Devon, and where people live/work, presents us all with a challenge.

One discussion point has been if actions are delivered, has an assessment been undertaken. In particular those that relate to changing national strategy/policy, or changing the approach of private operators (i.e. changing the NPPF and setting public transport fares). The City Council supports the aspiration, but we need to be realistic with our communities to residents on delivery.

We would like to encourage the Tactical Group to be bold in its expectations on action, we are undertaking this work because there is a climate emergency.

If a comment has been made against a particular Resolution of Condition, this has promoted feedback from elected member or officer. If a comment hasn't been made against a particular Resolution or Condition, we are overall supportive of the action.

## **Q1. What should be the role of onshore wind in the Devon renewable energy strategy?**

### **General comment on this section:**

The term renewable energy, includes biomass but does not include nuclear. Has there been any research undertaken, or taken into account, as to why biomass is included and nuclear is not?

### **Resolution 1:**

- The City Council is supportive of this resolution and is willing to engage and support rural communities in the development of on-shore wind (and solar). Considering the location, on the South West peninsular, and topography of Devon, on-shore wind generation (and solar) is a good source of creating renewable energy.

### **Condition 3:**

- Within local plans 'Where appropriate' should be removed. 'Where appropriate' waters down the intention and will not assist in meeting agreed net zero targets. The use of fossil fuels needs to be phased out, as fossil fuels are the predominant source of greenhouse gas emissions. Within guidance (planning and or building regulations) there should be a presumption in favour of renewables, the use of fossil fuels should be only on an exceptional basis only.

## **Q2. What needs to be done to encourage less car use in Devon?**

### **General comment on this question:**

- A congestion charge or parking levy needs careful consideration, not least the geography that is associated with such measures, a new charge/levy is unlikely to be successful if confined to the city boundaries. Employment parks on the periphery of Exeter would need to be brought into a charging regime to make it effective and avoid employment simply moving out of the city centre. Innovation in policy and solutions should be welcomed and explored.

- We need to create an environment where we can try initiatives and research and test ideas in a controlled manner. Exeter City Futures is trying to build a culture of collaboration to create a climate for innovation and change.
- Was there a discussion on introducing a levy/toll for unnecessarily large vehicles in our towns and cities, such as, 4x4's and SUV's?
- Was there a discussion on supporting last mile delivery hubs, to reduce the number of HGV's and delivery vehicles in our towns and cities? The City Council would be supportive of this.
- The public and businesses should be educated on the impact on the environment of stationary vehicles with their engines running. This is an issue outside schools with parents dropping off/picking up children, as well as delivery drivers leaving their engines running when making deliveries.
- Primary and secondary schools should be supported to create car free school streets. If parents live close by (within a certain radius) they are supported to walk or cycle their children to school. If they live a certain distance from the school they attend, electric school buses are introduced.
- The document does not go into changing the current diesel bus stock to electric. The City Council is supportive to transition the city's bus network to fully electric.
- To encourage more onto public transport, especially commuters, the public transport network across Devon needs to be expanded and improved, linking employment hubs to where people live, especially in rural communities.
- The City Council is supportive of removing vehicles from the city centre. Alternatives would need to be provided for those less able to access the city centre. This should also work alongside the development of off-road active travel routes into the city centre from neighbourhoods within Exeter.
- Has consideration been given to the introduction of 20mph speed limits in urban areas, and the impact on safety and the environment?

#### **Resolution 1:**

- The City Council supports this resolution, in that the all cars need to be made less attractive in comparison to integrated sustainable and public transport options.

#### **Condition 1.1:**

- Actions to discourage car use needs to be implemented, once a suitable alternative is implemented. There needs to be significant investment in the alternative (bus, train, active sustainable travel) to encourage car users into alternative travel modes.

#### **Resolution 2:**

- Whilst agreeing with this in principle, it doesn't highlight the reality that electric vehicles are unaffordable for many people. Any scheme to assist people to afford electric vehicles will be crucial.
- Could a condition be included that renewable energy supports developing an EV charging network within rural communities? The new solar farm on Marsh Barton in Exeter, is an example of good practice, in developing a solar farm to charge electric (waste & recycling collection) vehicles.
- Could an additional condition be included that the Highway Authority consider a hierarchy of investment, to support meeting the targets of net zero?
- Within Exeter the Highway Authority been innovative in regards to solutions of on-street EV charging. To support the safety pedestrians and those with limited mobility and visibility, in future, could the charging infrastructure be placed on the highway (road) and not on pavements. Shared EV infrastructure should be prioritised within neighbourhoods on the highway, to avoid residents and others paving over green spaces, resulting in a loss of green spaces to support biodiversity in our city.

#### **Resolution 3:**

- The deprioritising of road space for cars will be unpopular with the electorate, we will all need commitment from County Council to do what is right to support net zero.

#### **Condition 3.1 / 3.2:**

- These conditions are very welcomed and strongly supported.
- The existing Park & Ride network needs to be upgraded to include facilities for multiple electric vehicles
- When other cities have provided free or highly subsidised public transport, usage has increased dramatically. Is there any evidence from within Devon of a reduction in car use amongst those of state pension age when they receive their bus pass?
- Reference should be made to existing 'park and ride/change' facilities for clarity to support this condition, as well as mobility hubs and shared mobility. This is also referenced within existing transport strategies and the work of Liveable Exeter.

**Condition 3.3:**

- We recognise that this will be challenging without national government support. Cycling infrastructure needs to be meaningful and fit for purpose, new routes to be of the same standard as the cycle route near Sainsburys in Pinhoe, Exeter.

**Condition 3.4:**

- This condition of means tested travel passes is supported by the City Council – those of state pension age, students, those on an apprenticeship and Universal Credit claimants.
- The universal provision of a bus pass at state pension age encourages those to use the bus, and the lack of a means test places an unequal burden on low income families and individuals.
- The cost to travel within Devon by bus and train is expensive from some, with car parking a cheaper alternative if multiple family members travel at the same time. How can we change the pricing structure for public transport, to encourage residents, commuters and visitors to use the public transport network.

**Condition 3.5:**

- Overall, the City Council is supportive of a 'Tourist Levy'. Research to be undertaken to understand the impact of a levy on the tourist trade – could this make Devon a less attractive place to visit.
- Considering the impact of Covid on the tourism economy over the past 2 year, the introduction of a Tourist Levy is likely to be unpopular with the tourism and hospitality industry. The Tourist Levy would need to demonstrate a positive impact on the county, in regards to travel and the environment to gain support.
- There should be an exploration of how the Tourist Levy could contribute to net zero aspirations, with the option of a visitor offsetting their carbon emissions in some way.

**Resolution 5:**

- The City Council is supportive of this resolution and is working towards reducing the number of off street car parking sites/spaces within the city centre, in providing alternative uses for these sites.

**Condition 5.1:**

- District Council's rely on car park income to provide statutory and non-statutory services to a high standard. District Councils aren't currently in a financial position to ring fence car park income.

**Condition 5.2:**

- If progressed with, an Equality Impact Assessment would need to be undertaken to understand the impact on those with a protected characteristic and those on low incomes.

**Condition 6.1 / 6.2 / 6.3:**

- The City Council is supportive of these conditions, and should be explored for the city. Income generated to be ring fenced for sustainable travel and transport improvements, in the city that has the workplace levy implemented, so users benefit from the levy.

**Resolution 7 & Condition 7.1 / 7.2:**

- The City Council is supportive of introducing a congestion charge and or a low emission zone in an urban environment, such as Exeter, where there is a significant number of in-commuters

- If introduced in Exeter, the income generated should be secured and ring fenced for transport and environmental improvements within and immediately surrounding the city.

**Q3. What would be the best ways of encouraging, or requiring, people to retrofit their homes, properties or business premises to reduce carbon emissions?**

**General comment on this question:**

- When a business install solar panels to their property, their rateable value increases, which results in an increase in their business rates bill. This is a deterrent for some businesses. Over time, this should be reversed, premises with a high EPC rating (A-C) pay less business rates and those properties with a low EPC rating (D-G) pay more business rates.

**Resolution 2:**

- The City Council is supportive of this resolution. The City Council is currently leading on a retrofit programme, upgrading council owned homes to passivhaus standard.

**Resolution 3:**

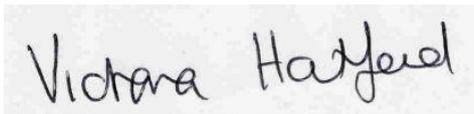
- From updated guidance received from central government (15 Dec 2021), this action needs to be amended with a focus on Building Regulations, and not planning.

**Condition 4.1 / 4.2 / 4.3:**

- From updated guidance received from central government (15 Dec 2021), this action needs to be amended with a focus on Building Regulations, and not planning.
- This supporting text is giving legitimacy to an action that some experts feel is unworkable. This needs to be tested legally.

If you require clarity on any comments raised above, please do not hesitate to contact myself. The City Council, both elected members and officers, look forward to working with you on delivering the Devon Carbon Plan.

Yours sincerely



Victoria Hatfield  
Service Lead – Net Zero, Commercialisation, Business & Skills and City Centre

CLlr Rachel Sutton  
Portfolio Holder – Net Zero Exeter 2030