

EXECUTIVE

Date: Tuesday 6 September 2022

Time: 5.30 pm

Venue: Rennes Room, Civic Centre, Paris Street, Exeter

Members are invited to attend the above meeting to consider the items of business.

If you have an enquiry regarding any items on this agenda, please contact Mark Devin, Democratic Services Officer on 01392 265477.

Entry to the Civic Centre can be gained through the rear entrance, located at the back of the Customer Service Centre, Paris Street.

Membership -

Councillors Bialyk (Chair), Wright (Deputy Chair), Denning, Ghusain, Morse, Parkhouse, Pearce, Williams and Wood

Agenda

Part I: Items suggested for discussion with the press and public present

1 Apologies

To receive apologies for absence from Committee members.

2 Minutes

To approve and sign the minutes of the meeting held on 5 July 2022.

(Pages 7 -
22)

3 Declarations of Interest

Councillors are reminded of the need to declare any disclosable pecuniary interests that relate to business on the agenda and which have not already been included in the register of interests, before any discussion takes place on the item. Unless the interest is sensitive, you must also disclose the nature of the interest. In accordance with the Council's Code of Conduct, you must then leave the room and must not participate in any further discussion of the item. Councillors requiring clarification should seek the advice of the Monitoring Officer prior to the day of the meeting.

4 Local Government (Access to Information) Act 1985 - Exclusion of Press and Public

RECOMMENDED that, under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting during consideration of

items 13 and 14 on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1, 2, and 3 of Part I, Schedule 12A of the Act.

5 **Questions from the Public Under Standing order No. 19**

To receive questions relating to items on the Agenda from members of the public and responses thereto.

Details of questions should be notified to the Corporate Manager Democratic and Civic Support by 10.00am at least three working days prior to the meeting.

Further information about speaking at a committee can be found here: [Speaking at a Committee](#)

6 **Urgent Item - Household Support Fund extension - General Scheme**

To note the urgent decision for the Household Support Fund extension, which runs for 6 months from April 2022, with funding from DWP delivered to Devon County Council. Through Team Devon an element of the funding is passed to Devon district councils for delivery as a General Scheme. Exeter City Council has been allocated up to £122,838 to support low income families by the end of September 2022. For the Household Support Fund General scheme the group identified for a direct award was working age Council Tax Support recipients whose households include a dependent child or young person. This group was likely to have received help from the other DWP cost of living payments, paid at a flat rate regardless of household composition. It is reasonable to conclude that families will face a higher burden from rising costs of food, utilities and household essentials than a single person. The additional payment would go some way to addressing this imbalance for that group.

Due to the timescales involved it would not be possible to convene a meeting of the Council in advance of the implementation date. In accordance with the Council's Constitution, the matter was discussed and agreed by the Portfolio Holder for Customer Services & Council Housing and the Chair of Customer Focus Scrutiny Committee who agreed that this was an urgent decision. The Executive is now invited to note the Household Support Fund extension, which had been treated as an urgent matter.

Further information on this scheme and background to the reasons for the decision will be included in the upcoming Scrutiny Bulletin.

7 **Urgent Item - Council Tax Energy Rebate Discretionary Scheme policy**

To note the urgent decision for the Council Tax Energy Rebate allocation £188,700 for Exeter City Council households. The scheme agreed for Energy Rebate Discretionary Fund provides for support to:

- Households in council tax bands E (not with a disablement band reduction to band D applied) to H as at 1 April 2022 receiving council tax support.
- Households in council tax bands E (not with a disablement band reduction to band D applied) to H as at 1 April 2022 getting a 25% council tax discount as

a sole occupier.

- With a small proportion of funding being reserved for exceptional hardship cases not fitting the criteria above or the criteria for the mandatory scheme.

Due to the timescales involved it would not be possible to convene a meeting of the Council in advance of the implementation date. In accordance with the Council's Constitution, the matter was discussed and agreed by the Portfolio Holder for Customer Services & Council Housing and the Chair of Customer Focus Scrutiny Committee who agreed that this was an urgent decision. The Executive is now invited to note the Council Tax Energy Rebate allocation, which had been treated as an urgent matter.

Further information on this scheme and background to the reasons for the decision will be included in the upcoming Scrutiny Bulletin.

8 **Proposed adoption of Community Asset Transfer policy**

To consider the report of the Programme Manager Communities. (Pages 23 - 60)

9 **Food Law and Health and Safety Enforcement Service Plan 2022 - 2023**

To consider the report of the Director Net Zero Exeter & City Management. (Pages 61 - 106)

10 **Air Quality Annual Status Report**

To consider the report of the Director Net Zero Exeter & City Management. (Pages 107 - 212)

11 **Northbrook Wild Arboretum: Project Initiation and Funding**

To consider the report of the Director Net Zero Exeter & City Management. (Pages 213 - 236)

12 **Exeter Plan: Outline draft consultation**

To consider the report of the Director of City Development. (Pages 237 - 344)

Part II: Items suggested for discussion with the press and public excluded

Representations have been received in respect of item 14 in accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, in that the items of business should be determined in the public section of the meeting for the following reasons:-

Item 14 - Exeter City Living 6 Month Update - Financial Year 2022/2023

"This item should be heard in public as it relates to proposed development by Exeter City Living Limited for which Exeter City Council, as both local planning authority and owner of Exeter City Living Limited, may grant itself planning permission or permission in principle pursuant to regulation 3 of the Town and Country Planning General Regulations 1992.

"As such, Paragraph 9 of Schedule 12A of the Local Government Act 1972 prevents this information from being exempt information by virtue of Paragraph 3, so it should be disclosed to the public.

"The scope of Paragraph 9 is not restricted to applications for planning permission, but to all information which relates to proposed development for which the local planning authority may grant itself planning permission

"Paragraph 10 does not apply to this information as it is prevented from being exempt by virtue of Paragraph 9.

"The public interest test described in Paragraph 10 only applies to the application of an information exemption which falls in any of paragraphs 1 to 7 if that information is not prevented from being exempt by virtue of paragraphs 8 or 9.

"As the information is prevented from being exempt by virtue of Paragraph 9, a public interest test does not apply and the information cannot be exempt.

"In addition, the scope of information exemption described by Schedule 12A of the Local Government Act 1972 is limited by the Freedom of Information Act 2000 and subsequent judgements.

"Information described by Paragraph 3 is not exempt information unless the sensitivity of that information has been demonstrated in detail with substantive reference to the probability of specific economic harm to specific commercial or industrial interests that would result from disclosure.

"Unless that sensitivity has been demonstrated the information is not exempt."

The report does not relate to an application for planning development or to a proposed development. The report is a half yearly update, for information only, which will contain information relating to the financial or business affairs of Exeter City Living, as described in paragraph 3 of Part 1 of Schedule 12 A to the Local Government Act 1972.

Paragraph 10 of Part 2 Schedule 12A of the Local Government Act 1972, states that information which falls into paragraphs 1-7 of Part 1 Schedule 12A of the Local Government Act 1972 is exempt information if, and so long as in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

The proposed reason for the exemption is that it is in the public interest to maintain the confidentiality of the company's business matters. Therefore our view is that the report will contain exempt information and that the exemption should be kept on this basis and therefore the recommendation that the item be taken under Part 2, will be maintained.

In accordance with Regulation 5, Paragraph 5, Part 2 of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 concerning the procedures prior to private meetings, the details of the representation received have been included on the agenda with the statement of response to representations. The agenda has been published within five clear working days ahead of the meeting, in line with legislation.

13 Member Training

To consider the report of the Director Corporate Services.

(Pages
345 - 382)

14 Exeter City Living Six Month Update - Financial Year 2022/2023

To consider the report of the Managing Director, Exeter City Living Ltd.

(Pages
383 - 406)

Date of Next Meeting

The next scheduled meeting of the Executive will be held on **Tuesday 4 October 2022** at 5.30 pm in the Civic Centre.

A statement of the executive decisions taken at this meeting will be produced and published on the Council website as soon as reasonably practicable.

Find out more about Exeter City Council services by looking at our web site <http://www.exeter.gov.uk>. This will give you the dates of all future Committee meetings and tell you how you can ask a question at a Scrutiny Committee meeting. Alternatively, contact the Democratic Services Officer (Committees) on (01392) 265115 for further information.

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EXECUTIVE

Tuesday 5 July 2022

Present:

Councillor Bialyk (Chair)

Councillors Denning, Ghusain, Parkhouse, Pearce, Williams and Wood

Apologies:

Councillors Morse and Wright

Councillor K. Mitchell (as an opposition group Leader)

Councillor D. Moore (as an opposition group Leader)

Also present:

Councillor Jobson (as an opposition group Leader)

Also present:

Chief Executive & Growth Director, Deputy Chief Executive, Director Net Zero Exeter & City Management, Director of City Development, Corporate Manager Democratic and Civic Support, Service Lead Legal Services, City Surveyor, Service Lead - Net Zero, Commercialisation, Skills, Business and City Centre, Deputy Chief Finance Officer, Service Lead Housing Needs & Homelessness, Principal Project Manager (Development) (MD) and Democratic Services Officer (HB)

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MINUTES

The minutes of the meeting held on 31 May 2022, were taken as read, approved and signed by the Chair as a correct record.

64

DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

65

QUESTIONS FROM THE PUBLIC UNDER STANDING ORDER NO. 19

No questions from members of the public were received.

66

PROPOSED CHANGES AND RE-PROCUREMENT OF OUTREACH-LED ROUGH SLEEPING SERVICES

The Executive received the report on how improvements could be made to the effectiveness of the Council's current commissioned outreach services to help target and reduce rough sleeping in the city. Following the successful work with partners and the successful funding bid to the Department of Levelling Up, Housing and Communities (DLUHC), the Council was proposing to procure a remodelled service to better help meet the needs of people already rough sleeping in the city and those who were at risk of rough sleeping.

The Service Lead Housing Needs and Homelessness explained that the remodelled service would merge together the former Rough Sleeping Outreach Service, Housing First Floating Support and Navigator Services and briefly outlined how the remodelled service would function. To date, services had been procured and delivered individually. Rough sleepers commonly had contact with the Rough Sleeping Assertive Outreach team, Housing First Support service and the Navigator

service. Whilst collaborative working existed, there would now be more flexibility across the services with all three above services brought together and operating as a remodelled Homelessness and Rough Sleeping service.

The new provider would work with the Council to continue to reduce rough sleeping in the city and the remodelled project would be an integral feature of the new Exeter Homelessness and Rough Sleeping Strategy expected in Autumn 2022.

During the discussion, the following points were made:-

- flexible working across the three services would lead to improved shared working, taking advantage of the existing knowledgeable and experienced staff working in these areas; and
- working with partners, the Council's successful bid for Government funding will help address Exeter's rough sleeping needs and greater Government funding should be made available for similar support across the country.

RECOMMENDED that Council approve:-

- (1) the undertaking of a procurement process compliant with the provisions of the Council's Procurement and Contract procedures and the Public Contracts Regulations 2015 in order to identify a provider to deliver a remodelled Homelessness and Rough Sleeping service; and
- (2) entering into a contract with the successful tenderer.

67

ALLOCATION OF THE ONE OFF NET ZERO BUDGET

The Executive received the report which sought approval to spend the £1million earmarked reserve to support the delivery of Net Zero projects and the goals of the Net Zero Exeter 2030 Plan, covering the next four years.

The Service Lead Net Zero and Business reported that the allocation would comprise £800,000 for City Council Net Zero initiatives and £200,000 for the delivery of the Net Zero Exeter 2030 Plan. All activity through this budget would be procured through the City Council's procurement and contract procedures. The following were highlighted:-

- two temporary team members had been appointed for the next four years to support City Council Net Zero projects, with a total of four officers in the new Net Zero team;
- a Net Zero Risk Register had been developed and would be presented to the Audit and Governance Committee;
- an action plan to reduce City Council carbon emissions would be presented to the Strategic Scrutiny Committee, Executive and Council this autumn. The action plan would provide greater clarity on the breakdown of the £800,000 funding;
- the Green Accord would be re-launched and the green accreditation scheme would improve supply chain sustainability to reduce Scope 3 emissions;
- decarbonisation studies would be undertaken for high use sites such as RAMM and the City Council's leisure centres;
- Carbon Literacy training would be held for the team, Members and the Net Zero Ambassadors; and

- external funding would be sourced for the delivery of the City Council's Net Zero Carbon Reduction action plan and a bid had been made to the LEVI Electric Vehicle Charging infrastructure fund.

During the discussion, the following points were made:-

- initiative is welcome including solar panels on the Riverside roof and adding a number of batteries to existing solar sites and a new solar array on Marsh Barton, which links up to Exton Road for the electrification of electric refuse vehicles and our fleet vehicles;
- the Net Zero Ambassadors will prove a valuable addition to the Council's ambitions of reducing service carbon emissions, change behaviour, support sustainable travel and smarter working and reduce waste;
- the Green Accord accreditation scheme would improve supply chain sustainability by increasing the numbers of businesses being accredited and reduce Scope 3 emissions; and
- the failure of some of Devon County Council's Electric Vehicle Charging points across the city which need replacing is regrettable.

RECOMMENDED that Council approve:-

- (1) the allocation of the £1million earmarked reserve to support the delivery of Net Zero for Exeter City Council and the Net Zero Exeter 2030 plan, covering the next four years;
- (2) that £800,000 of the £1million earmarked reserve be allocated to delivering net zero for the City Council and £200,000 be allocated to the delivery of the Net Zero Exeter 2030 Plan; and
- (3) an additional £50,000 from the underspent supplementary budget in 2021/22 be allocated to support the delivery of the Net Zero Exeter 20230 Plan.

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UK SHARED PROSPERITY FUND, EXETER ALLOCATION

The Executive received the report which provided an overview of the UK Shared Prosperity Fund (UKSPF), and how the Council could use and manage Exeter's allocation.

The Service Lead Net Zero and Business spoke about her presentation which is attached to the minutes setting out the detail under the following headings:-

- Shared Prosperity Fund (SPF) Aims;
- Communities and Place City Challenges;
- Communities and Place Ideas;
- Supporting Local Business City Challenges
- Supporting Local Business Ideas;
- People and Skills City Challenges; and
- People and Skills Ideas.

The Service Lead Net Zero and Business highlighted the following:-

- shared prosperity was a central pillar of the UK Government's levelling up agenda;

- SPF replaced previous European funding, one such funding being the Water Lane Smart Grid and Solar Project led by the City Council;
- the Department for Levelling Up and Communities was leading on SPF and the City Council was now working on its investment plan with £20,000 allocated for this purpose;
- Exeter allocation was £1,403,000 for three years, the annual breakdown, being £170,373 for this financial year, £340,747 for 2023/24 and £892,757 for 2024/25;
- 4% of SPF at £56,120 was allocated to project administration and management, to include the appointment of a Temporary Project Manager;
- to access the allocation, the investment plan would need to be submitted by 1 August 2022. It was a high level document, highlighting city challenges and would be signed off by the Leader, Chief Executive and the Section 151 Officer;
- as the value of interventions proposed was over the allocation of £1.4million each intervention would need an application which would be assessed against the aims and objectives of SPF, deliverability, value for money and the Exeter Vision;
- consultation with the business community on city challenges was a key element and three online sessions had been held focussing on the investment priorities of SPF, being communities and place, business support and people and skills. The Liveable Exeter Place Board had been chosen as the Local Partnership Group to consult with to gain local insight of city challenges and to gain consensus of the Investment Plan;
- copy would be prepared for the City Council website, so that any business or organisation can submit a project concept form for funding through SPF; and
- regular updates would be provided to the Strategic Scrutiny Committee to monitor progress.

The Service Lead Net Zero and Business further advised of the intention to establish a SPF working group for oversight and monitoring. City Council officers would serve on the working group and both Exeter Chamber and InExeter had been contacted as two organisations to represent a number of businesses across the city, to sit on the working group.

Councillor Wood, as Portfolio Holder for Climate Change, welcomed the report, emphasising the goal of building pride in place and increasing life chances. Although availability of funds was finite, it would be important to ensure value for money as well as seeking to focus on the Council's Net Zero 2030 ambitions to reduce carbon emissions and increase bio-diversity.

RECOMMENDED that Council approve:-

- (1) officers developing an investment plan to deliver the aims of the UK Shared Prosperity Fund (UKSPF), to release Exeter's UKSPF allocation of £1,403,000;
- (2) delegated authority being granted to Exeter City Council's internal UKSPF Management group for the approval of the investment plan;
- (3) the appointment of a Project Manager to support the management and monitoring of the Exeter UKSPF following the receipt of the offer letter from the Department for Levelling Up, Housing and Communities (DLUHC); and
- (4) the earmarked £20,000 administration payment for developing Exeter's investment plan and consultation process, with any surplus used for project administration.

RESOLVED that Executive note that:-

- (1) in order to meet the UKSPF requirements, consultation on Exeter interventions would take place with a number of organisations with an interest in the delivery of UKSPF in Exeter, and the Liveable Exeter Place Board; and
- (2) to ensure the effective management and monitoring of the UKSPF, an internal officer working group (UKSPF Working Group) be established, which will provide regular update reports to the Strategic Scrutiny Committee.

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LOCAL VALIDATION LIST

The Executive received the report on the Local Validation List, which enabled local planning authorities to set out the supporting information they required for planning applications and planning permission, which was in addition to the standard national requirements. Local List requirements needed to be reviewed and published every two years to carry statutory weight.

The Assistant Service Lead - Development Management (Major Projects) advised that the Council's previously adopted Local List documents on the Council website had been published in 2010/11 and were therefore out of date. Following a six week consultation on a new Local List, undertaken between 17 June and 29 July 2021, comments had been received and were taken into account in a final Local List, which required formal adoption by Executive.

The document was split into two main parts: a series of tables setting out the information required for different types of planning application and the circumstances of when the information was required; and guidance on the information, including links to further technical guidance and key contacts.

Councillor D. Moore, as an opposition group leader, had submitted a question on this item, but was unable to be present. The question and answer are attached to the minutes.

RESOLVED that:-

- (1) the Final Local Validation List be adopted;
- (2) to ensure that national requirements were kept up to date with any new planning legislation or amendments to existing legislation, delegated authority be granted to the Director City Development to make any amendments the Local List and technical guidance in section 4.0 of Appendix C of the report; and
- (3) the Executive note that any amendments to the list of local requirements in Section 3.0 in Appendix C of the report, would require consultation before being carried out and that the Local List would be brought back to the Executive for re-adoption.

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PROGRESS UPDATE FROM EXETER CITY FUTURES AND CITY OF EXETER GREENHOUSE GAS INVENTORY

The Executive received the progress report from Exeter City Futures Community Interest Company (CIC) outlining the work being undertaken to progress the Net Zero Exeter 2030 Plan, which included the Baseline Greenhouse Gas (GHG) inventory for the city, the reductions required to achieve Net Zero in 2030 and also

identifying specific and timely metrics for monitoring progress towards carbon neutrality in each emissions sector.

The report outlined the scale of the challenges faced in achieving a Net Zero city by 2030 and provided measurable key performance indicators for use as a strategic dashboard on the performance for the city and provided suggested options for achieving the Net Zero goal. The report had also been presented to Strategic Scrutiny Committee on 16 June 2022, and its comments had been included in the report presented.

Referencing *The Creative Bureaucracy* and its *Radical Common Sense* book by authors Charles Landry and Margie Caust, the Chief Executive & Growth Director emphasised the seriousness of the challenge the world now faced and how Exeter, and the City Council in particular, were seeking to respond.

Referring to UK Government and local authority initiatives, he identified a gap between the City Council's ambitions and those of some other local authorities and also the Government itself. Exeter City Council had declared a Climate Emergency in 2019 and pledged to work towards creating a carbon neutral city by 2030, which was 20 years in advance of the national 2050 net zero target required under the Climate Change Act 2008. It was therefore showing leadership of place at a critical time and he proceeded to detail both the seriousness of the problems and initiatives that could be taken.

The strategy for delivering a Net Zero Exeter was broadly understood and the circulated report set out measures that could be taken, but the challenges and complexity of implementing these were largely self-evident. Measures included:-

- optimise the amount of renewable energy from photovoltaics (PV) on residential and commercial properties;
- connect over 11,000 additional homes to district heating networks;
- minimise energy use within buildings by retrofitting commercial buildings, and retrofitting the homes in the city with a fabric first solution, such as cavity wall insulation;
- replacing all gas boilers with air heat pumps - 42,000 in total;
- replacing all fossil fuel cars - there were 50,430 licensed vehicles in Exeter - with Electric Vehicle (EV) battery cars;
- making the most of the short journeys in the city by walking or cycling and increasing the amount of cycling;
- plan all new homes so they don't need to be retrofitted; and
- make sure all new homes are within 15 minutes of facilities and designed in a fashion to avoid the need to use the car, and improve recycling rates.

The City of Exeter's institutions collaborating for local impact was an explicit aim of the Exeter 2040 Vision and, in Exeter, the City Council and County Council had vital roles to play in putting in place a policy framework to deliver the Net Zero goal for Exeter. The city's institutions regularly met and explored the challenges through the Liveable Exeter Place Board and the city was therefore in a better position than many places in galvanising organisations behind ambitious goals.

The Centre for Energy and the Environment at the University of Exeter had been commissioned to establish the GHG inventory for the city to quantify the reductions required to achieve Net Zero in 2030. The GHG inventory had set out the reductions required by sector to meet the Net Zero 2030 goal which would require policy development in the coming months. Some of these were:-

- optimising the contribution of existing roofs, domestic and commercial, to accommodate PV;
- planning policies on new build, mechanisms for enhancing biodiversity, biodiversity enhancement and multi-authority agreements on renewable energy;
- rolling out more district heating networks;
- immediate provision of EV charging infrastructure both for buses, fleet and private vehicles;
- additional retrofitting for HRA properties;
- planning policies in support of cycling and pedestrians with reprioritisation of spaces and infrastructure to support cycling; and
- stepping up of recycling and roll out of food waste.

There were insufficient resources for traditional project management delivery in support of this ambitious programme but it was considered possible to pull together resources for a core team to roll out the scale of initiatives required sector by sector to meet the 2030 timeline. Joint ventures with the private sector would be important and reference was made to initiatives in other areas such as Bristol's commitment to electric vehicles and the North Devon biosphere.

Councillor D. Moore, as an opposition group leader, had submitted questions on this item, but was unable to be present. The questions and answers are attached to the minutes.

Councillor Jobson, as an opposition group leader, spoke on this item. She sought clarification on a timeline for meeting the challenges in view of the resource set change required and how average residential households could meet the practical challenges and the costs of implementing identified solutions. For example, the costs of EV battery cars were high and currently unaffordable to many households. She also referred to the possibility that individuals and families would forsake the opportunity for city centre living and adopt a preference for the suburbs to enable them to continue to commute and use their cars for a multiplicity of other reasons. In this respect, research was urgently needed if the 10 million kilometre a year's reduction in travel to 2030 was to be achieved. She also hoped that the issues identified would be placed in front of Scrutiny before being tabled before Executive and Council.

The Leader gave assurances that the matters identified would be considered by Scrutiny prior to further updates and report to Executive and that the timeline for considering the resourcing challenges would be the Autumn. He advised that there was no assumption that the cost of transition to Net Zero would be funded by the Council Tax as the scale of funding was likely to go well beyond the scope of normal tax funding and the impact of the cost of living crisis. He further advised that there had not been research on individual household costs and behaviour and also that the Transport Authority's Strategy for Exeter was for 50% of all journeys within the city to be active travel - the Council was simply communicating the scale of that challenge.

The Leader further stated that the Council had made a commitment to meeting the challenge of Climate Change and that it was unfortunate that some authorities had shied away from the challenge and had adopted the Government's target of 2050. He gave an assurance that every effort was being made to ensure that the city's partners were fully on board.

During the discussion, the following points were made:-

- Exeter benefitted from the presence of a car share scheme and Co Cars. One Car Club vehicle took at least six private vehicles off the road;
- Exeter's recycling rates were on track to improve and the actual amount of waste collected in the city was 296kg per person per year compared with Devon's of 360kg;
- a goal was to increase public awareness of the importance of recycling;
- the Council's commitment to retrofitting was a good news story providing an example to the private sector;
- welcome the leadership role assumed by the Council; and
- the need to move away from the reliance on internal combustion engines and to replace with electric powered vehicles is vital for the future.

The Portfolio Holder for Climate Change emphasised the scale of the challenge by referring to the breakdown of estimated greenhouse gas emissions in Exeter in 2019 by sector. He stated that Net Zero was one of the Council's core corporate priorities, with Net Zero Exeter 2030 explicit in the Exeter 2040 Vision. The report highlighted the size of the task ahead and he asserted the Council's commitment to meeting these challenges.

In response to the points made by Members, the Chief Executive & Growth Director re-iterated the challenges ahead which would require a whole systems approach with Liveable Exeter as a vanguard in this process. With 53,000 houses set to be built over the next 20 years in this part of Devon it could be anticipated that, unless the modal shift of 50% of all journeys within the city take place by walking and cycling, traffic problems and congestion would increase to the point where the highway network would no longer be able to cope and the necessary response from the Highway Agency and transport authority would be to oppose further development. The Government was continuing to fail to set necessary standards for house builders in spite of its stated commitment to combat Climate Change, a commitment which still permitted the fitting of gas boilers, which ultimately would require retrofitting and, crucially, its failure to set a Net Zero Target date lower than 2050. Such a target was not the City Council's approach.

The city possessed leading scientific research into climate change and developers approaching the planning authority were fully aware of the Council's Net Zero ambitions and the refusal to adopt lenient construction requirements. The Council had consistently shown leadership in the challenges as, for example, through the HRA retrofitting programme and its move away from an Economic Development team approach to a Net Zero commitment. Partners across the city were also cognisant of the challenges and, in response to the need for change, were seeking solutions through identifying investment and innovation opportunities which, would not only address Climate Change issues, but also benefit the local economy such as the creation of green infrastructure jobs.

RESOLVED that the Executive:-

- (1) acknowledge the requirement of a comprehensive and whole system approach to delivering Net Zero Exeter 2030, and that no single organisation, including the City Council, could solve the challenge of reducing city greenhouse gas emissions to zero. The Executive also acknowledge that a 20 year timetable ahead of national and county targets for net zero was very ambitious, requiring place based co-ordination and cross institutional cooperation. The Executive welcome the Exeter Greenhouse Gas Emissions Inventory, acknowledging the pace and scale of change required to deliver on the Net Zero 2030 goal and the required step change in resources, activity and policy making both at a local and national level;

- (2) invite Exeter City Futures CIC to reflect on the challenges of resourcing the step change in activity to meet the Net Zero 2030 Goal and options for meeting the challenges be provided for consideration by the Executive and Council;
- (3) welcome the Strategic Scrutiny Committee to look into the practical issues raised for the construction sector and the supply chain to meet the demands of retrofitting the housing and commercial stock, and support scrutiny members pursuing a wider brief as a critical friend of Executive in addressing the financial, technical and policy issues;
- (4) call for immediate and concerted effort to be taken on one specific intervention required under the Greenhouse Gas Emissions Inventory, such as the goal of connecting homes and non-residential buildings to a district heat network and explore the practical challenges to securing delivery with limited capacity against the 2030 time line to report a plan of action to the Executive by December 2022;
- (5) welcome the decision of the Strategic Scrutiny Committee to acknowledge the importance of biodiversity and carbon sequestration to address the challenge of delivering a Net Zero Exeter. The Strategic Scrutiny Committee be invited to advise the Executive on practical proposals for linking the planning and development system with the climate and ecological emergency and how to deliver net biodiversity gain on development sites and offsetting carbon in Devon; and
- (6) note that Councillor Zion Lights (Member Champion for Net Zero), had been appointed as a Director on the Board of Exeter City Futures, replacing the Chief Executive & Growth Director as the Council's Director on the Board.

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GENERAL FUND CAPITAL MONITORING 2021/22 AND REVISED CAPITAL PROGRAMME FOR 2022/23 AND FUTURE YEARS

The Executive received the report on the Council's overall financial performance of for the 2021/22 financial year in respect of its annual General Fund capital programme. The report also sought approval for the 2022/23 revised capital programme including commitments carried forward from 2021/22.

The Deputy Chief Finance Officer requested that £49,280 be added to the Capital Programme in order to facilitate an additional scheme for a Skate Ramp and BMX jumps at Pinhoe Station Road Playing Field. The existing skate ramp had been dismantled and stored in the Belle Isle Depot for re-use and it was planned to be reinstated at the eastern end of the playing field. It would be widened to allow it to be better used and to improve safety for users. Additionally, the existing BMX jumps would be levelled and replaced with a new pump track. It would be fully funded from Section 106 contributions which Council would be requested to approve on 19 July, so as to prevent delaying approval until October 2022.

Members supported the additional recommendation.

RECOMMENDED that Council approve:-

- (1) the overall financial position for the 2021/22 annual capital programme;

- (2) the amendments and requests for further funding to the Council's annual capital programme for 2022/23; and
- (3) an additional scheme for a Skate Ramp and BMX jumps at Pinhoe Station Road Playing Field with £49,280 to be added to the Capital Programme.

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OVERVIEW OF GENERAL FUND REVENUE BUDGET 2021/22

The Executive received the report on the overall financial position of the General Fund Revenue Budget for 2021/22 financial year. The report sought approval for the General Fund working balance, a number of supplementary budgets and the creation of new earmarked reserves.

The Deputy Chief Finance Officer drew Members' attention to the comments of the Section 151 Officer and to the request for Council to approve £4.3 million of supplementary budgets, the majority of which were funded by earmarked reserves. They were affordable and, in many cases, backed by external funding.

RECOMMENDED that Council notes and approves (where applicable):-

- (1) the net transfer of £6,687,965 from Earmarked Reserves as detailed in paragraph 8.11 of the report;
- (2) the supplementary budgets of £4,304,610 and budget transfers as detailed in paragraph 8.13 of the report;
- (3) the Earmarked Reserves at 31 March 2022;
- (4) the Council Tax account and collection rate;
- (5) the outstanding sundry debt, aged debt analysis and debt write-off figures;
- (6) the creditors payments performance; and
- (7) the overall financial position of the Council and the General Fund working balance at 31 March 2022 of £5,480,752.

73

2021/22 HRA BUDGET MONITORING REPORT - OUTTURN

The Executive received the report which advised Members of the major differences between the approved budget and the outturn for the financial year up to 31 March 2022 in respect of the Housing Revenue Account and the Council's new build schemes in respect of its revenue and capital programme.

The Deputy Chief Finance Officer drew Members' attention to the comments of the Section 151 Officer advising of the challenges with recruitment and delivery of projects, which had a significant impact on expected spend in the year and pushed out the need for expenditure into future periods.

RECOMMENDED that Council approve (where applicable): -

- (1) the supplementary budgets of £550,500, as detailed in paragraph 8.5 of the report;
- (2) the HRA financial position for 2021/22 financial year; and
- (3) the revision of the HRA Capital Programme to reflect the reported variations detailed in Appendix 4 of the report.

74

TREASURY MANAGEMENT 2021/22

The Executive received the report on the current Treasury Management performance for the 2021/22 financial year and the position of investments and borrowings at 31 March 2022.

Councillor Jobson, as an opposition group leader, spoke on this item and asked for an update on the maturity dates of the Council's current fixed term deposits

The Deputy Chief Finance Officer provided the following updates as at 5 July 2022 in respect of Fixed Term Investments:-

Standard Chartered - 14/04/2022 - 14/10/2022 - 1.39%	3,000,000
Slough Borough Council -18/05/2022 - 20/02/2022 - 1.5%	5,000,000
Thurrock Borough Council - 12/05/2022 - 14/11/2022 - 1.20%	5,000,000
Goldman Sachs - 15/06/2022 - 15/12/2022 - 2.115%	3,000,000
West of England Combined Authority - 23/06/2022 -16/03/2023 - 1.65%	<u>5,000,000</u>
	<u>21,000,000</u>

The fixed term deposits set out in the report were in place at the end of the reporting date, 31 March 2022.

RECOMMENDED that Council note the content of the Treasury Management report.

75

IMPLICATIONS OF THE ELECTIONS ACT 2022

The Executive received the report on the implementation of the Elections Act 2022, which had received Royal Assent on 28 April 2022, and the potential impact on budgets and resources. Details of the various implications, costs and resources were presented in Appendix A of the report. Some parts of the Elections Act 2022 would be implemented by December 2022.

Particular reference was made to the following:-

- the need for the Council to make necessary budgetary plans to ensure it meets its obligations ahead of December 2022, and until confirmation was received from the Government to the budgetary support that would be made available to local authorities;
- an additional budget of £50,000 was sought for the current financial year pending confirmation of any extra funding support; and
- the need to plan ahead in anticipation of likely additional throughput at the polling stations themselves for which additional members of staff would be on duty on the day, as well as polling equipment and an additional staff member for the Electoral Service team.

Councillor D. Moore, as an opposition group leader, had submitted a question on this item, but was unable to be present. The question and answer are attached to the minutes.

The Corporate Manager Democratic and Civic Support responded as follows to Members' queries:-

- postal vote applicants would be required to refresh their applications every three years as opposed to the current five year requirement;
- further reductions could be required unless the Government fully funds the ongoing costs associated with the measures. There was a “new burdens” agreement between Central and Local Government whereby the Government promise to fully fund additional burdens on the sector - however this was often done at national level; and
- although there had been two suspected incidents of electoral fraud in recent elections in Exeter, both had been dismissed after Police investigation.

During the discussion, the following points were made:-

- concerns that individuals without ID such as a driving licence or passport would be excluded from voting;
- during a test pilot in London, approximately 1,000 voters had been turned away from the polling stations and had not returned; and
- of the 58 million who had voted in the 2019 elections, there had been 33 suspected voter impersonations, that is 0.0001%.

RECOMMENDED that Council:-

- (1) note the report and consider specific implications as and when further legislation is brought into force, over the next 6 - 18 months; and
- (2) approve a supplementary budget of up to £50,000 for the 2022/23 financial year, and any potential future budgetary requirements, to meet the immediate demands of the Elections Act 2022.

76

FORMER EXETER BUS STATION

The Executive received the report which sought funding to advance the demolition of the former Exeter Bus Station building in preparation for interim uses to be brought forward before the wider regeneration of the CityPoint site.

The City Surveyor reported that, as the new bus station has been operational for some time and the temporary uses of the upper and lower aprons during the construction of St. Sidwell’s Point had also been reduced, it was the intention to now bring forward demolition of the redundant facility allowing the City Council to have a cleared site on which to introduce a range of “meanwhile” uses.

A bid would be made to the Government’s Levelling Up Fund to demolish and replace the old Bus Station until the longer-term scheme could be delivered. If the bid was successful then the demolition would be funded from Capital Grant. Alternatively, the demolition would be funded from the surplus income generated from the acquisition of the Guildhall Shopping Centre.

Particular reference was made to:-

- the alternative approach of mothballing the site would be costly and prevent exploration of a range of “meanwhile” uses whilst the CityPoint scheme moves forward;
- the proposal would remove a significant constraint to the future re-development of the wider CityPoint site; and
- “meanwhile” uses would help animate the area adjoining the new leisure centre.

RECOMMENDED that Council approve the provision of the sum of £900,000 for the purpose of funding the demolition of the former Exeter Bus Station.

77 **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 - EXCLUSION OF PRESS AND PUBLIC**

RESOLVED that under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting during consideration of the following item on the grounds that it involved the likely disclosure of exempt information as defined in paragraph 3 of Part 1, Schedule 12A of the Act.

78 **GUILDHALL SHOPPING CENTRE**

The Executive received the report which informed on the agreed terms for the acquisition of the Guildhall Shopping Centre and the outline business plan for the asset going forward, following the decision by Council on 18 October 2021 to allocate funding to acquire the centre.

RESOLVED that the report be noted.

(The meeting commenced at 5.30 pm and closed at 7.27 pm)

Chair

The decisions indicated will normally come into force 5 working days after publication of the Statement of Decisions unless called in by a Scrutiny Committee. Where the matter in question is urgent, the decision will come into force immediately. Decisions regarding the policy framework or corporate objectives or otherwise outside the remit of the Executive will be considered by Council on 19 July 2022.

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Minute Items 69, 70 and 75

Questions and Responses - Opposition Leader Councillor D. Moore

Item 6 - Progress update from Exeter City Futures and City of Exeter Greenhouse Gas inventory

This is a question of process in relation to recommendation 2.4. Please can the Executive clarify if:-

- a) the 'one specific intervention such as the goal of connecting homes and non-residential buildings to a district heat network' is to be the priority for that immediate and concerted effort, or
- b) if the connection to a district heat network is not to be the focus of the immediate and concerted effort, please can the Executive describe when that decision will be made and by which body, and which goals will be considered?

Response

The purpose of the recommendation is to test whether there is an appetite to look at one of the many areas of the net zero plan, and to explore whether there is a mechanism for delivery that can be progressed in spite of the obvious resource constraints of the City Council.

This would be both as a learning exercise to understand the technical and resourcing issues but also to understand the appetite for embarking on a significant body of work. District heating is one of the specific measures identified in the greenhouse gas emissions report and therefore an appropriate subject for consideration. Given the City Council has no powers over the delivery it requires a collaborative approach and therefore indicative of the whole city co-ordination required to achieve the goal of a net zero city. If Members are so minded to explore a potential delivery plan for heat networks, the proposed approach would be presented to Executive as soon as practically possible.

On page 21 (point 8.7) the report says the Exeter City Futures now includes Oxygen House. Please can the Leader confirm on what basis Oxygen House is now involved and are they on the Board of Exeter City Futures?

Response

Oxygen House is a partner of Exeter City Futures and provides one of the Directors of the company.

Item 13 - Local Validation List

The response from the Chief Planning Officer in Devon County Council says Public Health colleagues welcome the inclusion of requirements for air quality assessments. Will the Executive please require an air quality assessment for all developments on sites within 20 metres of the air quality management area. (Page 212).

Response

The Local List requires Air Quality Assessments for all development on sites within 20 metres of the Air Quality Management Area (AQMA), unless Environmental Health has already agreed it is not needed. The purpose is to ensure that proposals for new housing, offices, etc. in close proximity to the AQMA will provide healthy living environments for the occupiers. However, this requirement may not be needed in all circumstances, which can be confirmed by Environmental Health during the pre-application discussions stage.

Item 15 - Implications of the Elections Act 2022

What provisions will be made to ensure that young people just turning 18 at the time of the election and people in temporary accommodation/homeless aren't excluded from voting because of the requirement to present identification?

Response

There are no specific details as yet, but a national communications campaign for voter identification will be the responsibility of the Electoral Commission (EC), including coordination of campaigns and supporting outreach and roll-out via partners. The EC and the Department of Levelling up Housing and Communities will work to ensure plans and timelines for communications and guidance can be aligned.

The EC will run both national campaigns aimed at all electors and targeted campaigns for specific groups. (This will be supplemented by information on the ECC website and social media platforms).

REPORT TO EXECUTIVE

Date of Meeting: 6 September 2022

REPORT TO COUNCIL

Date of Meeting: 18 October 2022

Report of: Director of Culture, Leisure and Tourism

Title: Proposed adoption of Community Asset Transfer policy

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 This report is to inform members about the proposed purpose, procedure and resource implications of adopting the attached Community Asset Transfer policy. We have met the Council's statutory (and good practice) duty to consult stakeholders and to present the adjusted proposed policy and processes to reflect as far as practicable the feedback received.

1.2 To provide a brief definition of Community Asset Transfer (CAT), and background in that over the past 10 years or so it has been increasingly considered good practice by the Local Government Association in terms of property portfolio management plan and enabling community empowerment and greater partnership.

1.3 Exeter City Council has drafted a Community Asset Transfer Policy which aims to provide a transparent, consistent and positive route-map for organisations who want to progress an application for a Community Asset Transfer for a building or land belonging to the Council.

1.4 A survey was launched in on the 1 June 2021 and was open for 8 weeks until 30 July 2021. Two workshops were held on the 6/7 July.

1.5 The purpose of the survey was to gain feedback from community organisations to help ensure that the policy is fit for purpose in terms of both being clear to use, and to help us to deliver benefits to the communities of Exeter.

1.6 This report gives information about responses to the survey and makes recommendations on the implementation of the policy.

2. Recommendations:

2.1 That Executive RECOMMENDS to Council to adopt the Community Asset Transfer Policy.

3. Reasons for the recommendation:

3.1 To implement the Community Asset Transfer Policy as attached.

4. What are the resource implications including non financial resources?

4.1 The initial officer identified to be the first point of contact from ECC will be from the Communities Team. They will work with the Estates Team as part of business as usual. This will form part of their role and will not incur any additional cost. Workload will need to be managed.

4.2 Many respondents have expressed the need for the council to be able to work in partnership with community and voluntary organisations who may wish to take on the responsibility for an asset. This would be achieved by maintaining where possible access to the current community grants programme to help contribute to costs of establishing and developing the facilities and services that the asset will be used for. This may be in the form of capital investments (such as through the Large Grants Fund) where funding is available up to £10,000 to help refurbish and modernise such premises, as this may well be work required by the community organisation prior to the asset being ready to generate its proposed sustainable income streams and self-sufficiency in the medium to long term.

5. Section 151 Officer comments:

5.1 The Policy provides a clear approach to assessing potential Community Asset Transfers. Members are reminded of their responsibilities of managing assets held on behalf of the Citizens of Exeter and along with Officers, they must ensure that any potential uses are financially robust and protect the assets for future generations. Councillors must balance aspirations along with their financial responsibilities when considering any requests.

6. What are the legal aspects?

6.1 When disposing of any surplus property the Council is generally under the duty imposed by S123 of the Local Government Act 1972 to do so at the best consideration reasonably obtainable. However the General Disposal Consent 2003 allows a disposal at an under value if it is for the social, economic or environmental wellbeing of the area, provided that undervalue does not exceed £2m.

A robust and transparent process for assessing the benefits of any proposed community asset transfer should be put in place.

Before any community asset transfer is agreed the Council's title to the property must be checked to ensure there are no legal restrictions.

7. Monitoring Officer's comments:

The legal aspects associated with the disposal of surplus Council property are clearly shown in paragraph 6 above. Particular attention is drawn to the content of the Local Government Act 1972 General Disposal Consent (England) 2003 which provided guidance to those local authorities in England (listed in paragraph 3(1) of the Consent) which have land disposal powers under sections 123 and 127 of the Local Government

Act 1972 ("the 1972 Act"). This gave greater freedom to authorities to exercise discretion in the disposal of their land where the difference between the unrestricted value of the interest to be disposed of and the consideration accepted ("the under value") is £2,000,000 (two million pounds) or less.

The attached policy sets out the process to be followed as and when requests are received for a potential community asset transfer. It is also suggested that Legal Services are informed at an early stage of any potential requests so that suitable legal advice is obtained in a timely manner.

John Street – Deputy Monitoring Officer

8. Report details:

8.1 Community Asset Transfer is the transfer of management and /or ownership of public land and buildings from its owner (in this case the local authority) to a community organisation (such as a Charitable Trust, a Community Interest Company or Social Enterprise) to achieve a local social, economic or environmental benefit.

8.2 Historically, Local authorities have had the general power to dispose of land and buildings in any way they wish, including the sale of a freehold interest and granting of long leaseholds. As a general rule, the expectation was that the authority should achieve the best price possible for the asset, known as 'best consideration'. However, the General Disposal Consent (England) 2003 gives Local authorities greater freedom to dispose of any interest in land (and buildings) at less than best consideration without the specific consent of the Secretary of State as previously required. Under this General Disposal Consent LA's may consider disposal at a reduced price (**including no cost**) if the purpose for which the land/building is to be disposed of is likely to contribute to the promotion or improvement of the economic, social or environmental well-being of its area. Any 'less than best' decisions will be determined by Executive, in line with existing Policy.

8.3 The use and occupation of council owned premises or land by the community and voluntary sector is not new. The Council has already leased assets such as the Valley Parks to Devon Wildlife Trust and Queen's Crescent Garden to St James Community Association as a result of a Compulsory Purchase Order and at the request of St James community Association. . Around 30 other sites are in community management either through transfer or long leases.

8.4 The overall aim of Exeter City Council adopting a Community Asset Transfer policy is to provide a transparent, consistent and positive framework for organisations who want to progress an application for a Community Asset Transfer for a building or land belonging to the Council. As the policy sets out; "*Any proposed asset transfer to the community will need to demonstrate that it will compliment and help to support the vision, aims and priorities of the Council as set out in its Corporate Plan*". The policy goes on to define: It's Aims and Principles; intended benefits and impacts; The Criteria to be adopted for assessing individual applications.

8.5 A draft policy was put out to public consultation for a period of eight weeks in summer 2021 to glean stakeholder support in principle, and to help gauge the extent to which the policy will enable us to deliver the intended benefits to the communities of Exeter. This

stakeholder consultation consisted of an on-line questionnaire survey and two interactive workshops hosted by Exeter Connect. This opportunity for feedback and suggested amendments submitted have helped to firm up the final version of the policy as attached in Appendix I.

In terms of consultation feedback, overall 27 respondents completed the questionnaire, of those over 85% supported the proposal that ECC should have a Community Asset transfer policy. The vast majority of respondents also indicated that the CAT policy had the potential to deliver the following benefits:

- Improve wellbeing & reduce social isolation
- Provide area-wide benefits for the residents of Exeter
- Support a more sustainable voluntary and community sector
- Nurture economic development & social enterprise
- Create improvements to local services & create new services
- Represent good value for money
- Attract additional investment and new external sources of funding
- Grow the resilience and self-reliance of communities
- Help the Council to achieve its strategic priorities

(Please refer to Appendix 2 for a full summary of the survey and responses)

8.6 Key concerns expressed by respondents to consultation regarding community organisations taking on the responsibility for managing assets:

“While I believe the policy has many positive benefits for communities, services and the council, the workload placed upon volunteers is huge, demands on the few individuals with responsibility within organisations needs to be considered so not to potentially overwhelm...”

“Must be a locally based organisation with local community members/ directors from Exeter”

Importance of working in partnership with communities:

“have to work 'with' communities in partnership rather than 'doing to' . More emphasis on enabling people... “

The council should retain ownership to be able to monitor use of the asset:

“The Council has to remain the owner of the building is better to run by organisations. We need the Council to monitor the access”

“How will this be monitored? And how easy will it be for the council to take appropriate action if the approach is not working”?

Support needed:

“The Council should support business planning & set out clear criteria against which it will be assessed.”

“Help with calculating social value would be useful”

General:

"I agree flexibility is required and this policy allows for that".

9. How does the decision contribute to the Council's Corporate Plan?

This policy contributes to the Council's Corporate Plan objectives of Building Great Neighbourhoods and Promoting Active and Healthy Lifestyles.

The Voluntary & Community Sector is a key part of the city's fabric and it delivers extraordinary value in the social capital brought to communities through the local connectivity, social organisation, leadership and ownership, demonstrated through the fantastic things that people achieve in and for their communities.

10. What risks are there and how can they be reduced?

10.1 Risks could include that a community organisation did not have sufficient financial resources, skills or capacity to manage the process of taking on responsibility for management of a community building or land. This risk would need to be minimized through a robust business plan and effective support through a city council lead officer also potentially through an infra-structure organisation guidance and support.

10.2 A building moving into management by a community organisation may not fulfil the aims as identified in the business plan, and fail to meet the needs of the target community. This would need to be addressed through ongoing communication, monitoring and break clauses in any agreement between the organisation and the council. This will be more easily addressed if any CAST is on a leasehold basis rather than a freehold transfer.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

11.4 The proposals to have a Community Asset Transfer Policy will positively support community and voluntary sector organisations in the city. This offers greater opportunities to support wider community involvement and engagement with residents in the city. The business plans will need to demonstrate how the organisation will ensure that the Centre/resources will be accessible and meet the needs of different communities in the city.

12. Carbon Footprint (Environmental) Implications:

No direct carbon/environmental impacts arising from the recommendations.

13. Are there any other options?

Not to have a Community Asset Transfer policy and continue to deal with enquiries on a one to one basis.

Director of Culture, Leisure and Tourism, Jon-Paul Hedge

Author: **Programme Manager Communities, Dawn Rivers**

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

- Appendix 1 Community Asset Transfer policy
- Appendix 2 Questionnaire (pdf)
- Appendix 3 Summary (pdf)

Detailed responses:

Respondents had links with 25 organisations in the city:

- Topsham Community Association
- Topsham Museum
- Topsham Community Tennis
- Bury Meadow
- Ludwell Life
- Exeter City Life Church
- Stoke Hill Community Association
- Stoke Hill PTFA
- Local Community composting group Castle Mount
- Exeter Community Energy
- Exeter Drama Company
- St Thomas Together
- St Thomas Community Association
- Cowick Wellbeing Hub
- Freemoovement
- Park Life Heavitree

- Estuary League of Friends
- The Nest South West Community Interest Company
- Exeter Community Alliance
- Wonford Community Learning Centre Ltd
- Alphington community Association
- Isca Community Enterprises
- Exeter Respect CIC
- Newcourt Community Association
- Wood For Good Exeter (25)

Contact for enquires:
Democratic Services (Committees)
Room 4.36
01392 265275

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Community Asset Transfer Policy – Exeter City Council

August 2022

1. Introduction

- 1.1 The use and occupation of council owned premises or land by the community and voluntary sector is not new. The Council has already leased assets such as the Valley Parks to Devon Wildlife Trust and Queen's Crescent Garden to St James Community Association. Around 30 other sites are in community management either through transfer or long leases. (Note 1)
- 1.2 The purpose of this policy is to build upon current experience and best practice to provide a clear policy framework for responding to future requests from community organisations for asset transfer.
- 1.3 Community Asset Transfer is the transfer of management and /or ownership of public land and buildings from its owner (in this case the local authority) to a community organisation (such as a Charitable Organisation, a Community Interest Company or Social Enterprise) to achieve a local social, economic or environmental benefit.
- 1.4 Local authorities have the general power to dispose of land and buildings in any way they wish, including the sale of a freehold interest and granting a lease. As a general rule, the expectation is that the authority should achieve the best price possible for the asset, known as 'best consideration'.
- 1.5 Under the provisions of the Local Government Act 1972: General Disposal Consent (England) 2003 there are circumstances where it is appropriate for a local authority to dispose of land 'under value' where it is for the economic, social and/or environmental wellbeing of the area. Disposing of an asset at less than the market value is known as disposal at "less than best consideration". In general, but not exclusively a Community Asset Transfer usually implies rental or sale at less than commercial value.
- 1.6 Local authorities do not have to undertake a marketing process for a Community Asset Transfer. However, there is a general requirement to follow "normal and prudent commercial practices". As long as a robust business case for asset transfer has been made, there is no requirement to 'market test' a transfer proposal to meet the General Disposal Consent.
- 1.7 However, if there is no competitive process, groups will be expected to submit a 'bid' for the asset in question demonstrating a robust business plan, long term funding position and management plan. It would also be necessary to identify clear community benefit justifying the use of public assets.
- 1.8 Due to the diverse nature of the Council's property holdings it is clear that one policy may not fit all circumstances. However a number of common themes will apply e.g. nature and capacity of the applicant, adoption of robust option appraisals including financial implications to the authority, contribution to corporate objectives, assessment of risks and sustainable business cases are essential before contemplating the transfer of any asset.

2. Purpose of this policy

- 2.1 The purpose of this policy is to set a transparent and positive framework to enable, where appropriate, asset transfer from Exeter City Council to the 'not for profit' and voluntary and community sector.

3. National Policy context

- 3.1 Through the introduction of the Community Right to Bid in the Localism Act 2011, Government has raised the profile of better utilising assets to meet community needs. *"The over-riding goal is community empowerment.... In a sense we are moving from an assumption that the state's role is to try and solve all social problems, to one where the state's role is to help communities solve their own problems". (Quirk: Making Assets Work 2007)*

4. Council's Disposal Policy

- 4.1 The use of premises by community organisations is considered as part of the analysis of surplus asset disposal alongside use by the Council itself and use by other public sector bodies. The priority will always be to obtain the best outcome to help deliver Council objectives. This requires balancing the best price reasonably obtainable to support the Council's finances against the benefits being offered through alternative uses including community asset transfer.
- 4.2 The Council has the opportunity under the General Disposal Consent to sell or lease general fund assets at less than best consideration in cases where it can demonstrate and attribute value to wellbeing benefits that would arise. Any disposal for less than best consideration would need to be transparent, justifiable and have the appropriate Executive or Council approval.

5. Local policy context and links to other strategies.

- 5.1 The operation of this policy will need to take into account the desired outcomes in the Councils Corporate Plan including;
- The City Council's 2018/2021 'Exeter Live Better' corporate plan aims to build on Exeter's growth by delivering strategic programmes that focus on the major challenges facing the City: tackling congestion, promoting healthy & active lifestyles and building great neighbourhoods.

Link: <https://exeter.gov.uk/council-and-democracy/council-information/corporate-plan-2018-21/>
<https://exeter.gov.uk/media/5362/our-strategy-autumn-2020-update.pdf>

Note: The 2022- 2026 corporate plan is due to be presented to Council in October 2022. .

- The Exeter Grants Programme is an exciting step forward for the Council in our endeavours to support community groups and organisations to address the demands that development places on the city. See <https://exeter.gov.uk/people-and-communities/grants/exeter-grants-programme/>

6. Aims of Community Asset Transfer

6.1 The Council's Property Portfolio includes land, buildings and other structures held to support direct service delivery, support delivery by partners including the voluntary sector, stimulate economic activity and regeneration, social, community and public functions. For some of these assets community management and ownership could deliver:

- **Benefits to the local community:** these can arise from: building confidence and capacity; attracting new investment and reinvigorating the local economy; and securing stronger, more cohesive and sustainable communities.
- **Benefits to the Council and other public sector service providers:** these can arise from : the creation of a new partner able to tap into additional resources ; the ability to engage with a more cohesive local community; new service provision complementing and augmenting statutory services
- **Benefits to the organisations taking management:** these can include: financial security; increased recognition; power; management capacity and organisational development, and through having a secure base opportunities to expand and diversify.

6.2 The Council could expect to be seeking the following benefits from community asset transfers:

- Neighbourhoods that support wellbeing and reduce social isolation
- Area wide benefits for the residents of Exeter City Council
- A sustainable voluntary and community sector
- Economic development and social enterprise
- Improvements to local services
- Value for money
- Delivery of Corporate Plan priorities

7.0 Principles of our Community Asset Transfer policy

7.1 The City Council policy on Community Asset Transfer is underpinned by the following principles:

- Any proposed asset transfer must support the aims and priorities of the council as set out in the corporate plan or underpinning policy/strategy.
- Any proposed asset transfer must recognise the Council's dual role as a supporter of the voluntary sector but also as a steward of publically owned assets.
- The Council will put in place a transparent corporate process for asset transfer which will include a single point of first contact and clear stages and timescales for each party.
- The Council will set out a single method of assessing the benefits of the transfer (linked to corporate priorities) which allows a comparison with market disposal.
- If any disposal at less than best consideration is pursued it will be accompanied by a legally binding service level agreement (SLA) identifying the benefits and how these will be monitored and measured.

8.0 Criteria to be adopted for considering requests for Community Asset Transfer

8.1 The Community Asset Transfer decision involves the assessment of a number of criteria including considering the options arising from:

- Benefits to respective parties e.g. Council, community organisation, generated by the transfer of the asset to the community
- Loss of any existing income
- Potential loss of opportunity costs arising from transfer
- Retention of assets for direct service delivery
- Raising of capital receipts for future investment in direct service provision

8.2 Requests for the transfer of council owned assets would be considered where the following criteria are met.

a) The Applicant must be:

- Community led, i.e. it's governance arrangements must ensure that it has strong links with the local community and that members of the community are able to influence its operation and decision-making processes;
- A Voluntary and Community Sector organisation – i.e. it must be a legal entity which is:-
 - Non- governmental – not part of the statutory sector
 - It must exist for community/social/ environmental benefit
 - Non- profit distributing – it must reinvest any surpluses to further its social aims/ community benefits;
 - Has community benefit objectives
- The organisation must be appropriately constituted, for example, a registered charity, a community interest company (CIC) a not for profit company or a co-operative. The constitution should allow the management and ownership of buildings and provision of services.

b) The Asset will be :

- In the freehold/leasehold ownership of the Council from which the transferee can demonstrate community benefit.
- Reviewed to :
 - assess the suitability of the asset for Community Asset Transfer by way of an options appraisal against alternate uses (where competing uses are apparent);
 - identify if it is not currently needed or identified for future investment value or use for direct service delivery, which could best be provided by the authority rather than through the community;
 - identify if the transfer will help to deliver the strategic priorities of the Council or other public bodies;

- ensure it is fit for purpose and would not impose an unreasonable liability to the Voluntary Sector Organisation or the Council or that a robust plan is in place to address any issues or liabilities;
- Ensure transfer or management of an asset would not be contrary to any legal restriction or obligation placed on the Council.

c) Proposed use of Asset will

- Demonstrably help in the delivery of the Council’s Corporate Plan
- Ensure extensive and inclusive reach into the community and will be open to all.
- Maximise opportunities for income generation to ensure sustainability, for example, through social enterprise and the hiring of space and facilities.
- Ensure there is both a need and an ongoing demand for the activities being proposed and consideration is given to whether or not this is being satisfactorily addressed by another organisation.
- Ensure a clear management structure demonstrating how premises will be managed on a day to day basis, and with legislation affecting occupation of premises.

d) Business Plan and Finance

Fundamental to the success of any transfer is the applicant being able to demonstrate to the Council that they have a clear rationale backed by a robust business-case of their ability to manage the asset effectively. In terms of proposing a business case for consideration by the Council any applicant will need to clearly identify:

- At least 5 years revenue or capital funding plans and projections of managing and operating the asset.
- How it will invest in and maintain the asset including a specific plan as to how all health and safety responsibilities will be met.
- The planned outcomes and benefits to result from the asset transfer
- Demonstrate a community governance structure with capability to sustain asset transfer and has identified necessary capacity building requirements within the organisation
- Where transfer is requested at less than market value either freehold or leasehold the applicant has justified and quantified the benefits to the community and Council to justify the subsidy. The Council will separately need to satisfy that any transfer is within its legal and financial powers
- Track record of delivering services and/or managing property
- Financial sustainability and forward planning

9. Consideration by the Council

9.1 In view of the diverse nature of assets within the Council’s ownership, there is no one disposal methodology that suits all circumstances for example the majority of current agreements are that asset transfers are by means of leases or licenses. Freehold transfer will be considered in exceptional circumstances, and must be the subject of a specific report to Council to gain approval. It would be critical in such circumstances to have in place rigorous safeguards for ongoing stewardship and for the sustainability of the proposed use of the asset. Nature of Tenure offered will be on a case by case basis having regard to the

particular circumstances of the project, strength of the applicant and sustainability of the business case etc.

- 9.2 An officer from the Council's Active and Healthy People's Team will act as the initial point of contact for any group wishing to discuss a potential asset transfer to help navigate the multiple departments that would need to be involved to make a decision. This is to provide consistent, accurate and constructive information and advice to all initial enquiries and to maintain a record of all contracts and areas of interest for good governance and to inform future strategy.
- 9.3 The officer will provide information on what is involved and the skills, experience and resources an organisation would need to embark on an asset transfer. If the initial enquiry relates to a particular building then Corporate Property would be contacted by the officer to see if this building is potentially available for consideration of a CAT. The Council will establish a 'list of needs' that properties could be matched to.
- 9.4 Should an organisation wish to proceed they will need to submit a brief Expression of Interest Form. Officers would work in conjunction with the leader of the council and portfolio holder to, if appropriate, progress any business case to Executive. The transfer of the asset will be managed by an officer within the Corporate Property Services.
- 9.5 The Community benefit of an asset transfer will be assessed by representatives from the Estates team and the Communities team in the first place, after considering the business plan and application and with reference to criteria referenced in no. 8

Notes:

1. The Queen's Crescent gardens site was Compulsory Purchase Ordered (CPO'd) by ECC at the request of St James Community Association on the basis they would take responsibility for the site.

Appendix 1.

Community Asset Transfer Help and Advice

'My Community' have produced guidance setting out the stages of asset transfer for community groups who want to start the process of developing an asset transfer project.

<https://mycommunity.org.uk/help-centre/resources/land-and-building-assets/getting-started-asset-transfer/>

The Local Government Association with support from Locality have produced a guide for Local Authority officers 'Empowering Communities: making the most of local assets' (2012).

<https://locality.org.uk/wp-content/uploads/2018/03/Companion-Guide-for-Local-Authorities-Empowering-Communities.pdf>

There is also a guide for Councillors 'Building powerful communities through community asset transfer'.

<https://locality.org.uk/wp-content/uploads/2018/05/Understanding-Community-Asset-Transfer-Guide-for-Councillors.pdf>

Exeter City Council

Community Consultation Survey to gather feedback on the Council's proposed Community Asset Transfer Policy and Process

Exeter City Council has drafted a Community Asset Transfer Policy which aims to provide a transparent, consistent and positive route-map for organisations who want to progress an application for a Community Asset Transfer for a building or land belonging to the Council. We would appreciate your views on our draft Community Asset Transfer Policy to help ensure that the policy is fit for purpose in terms of both being clear to use, and will help us to deliver benefits to the communities of Exeter.

Please complete this short survey which should only take about 20 minutes to complete. The survey is open to everyone but we are particularly keen to hear from representatives of the community, voluntary and social enterprise sector.

If you require this survey in another format please contact: ecwt@exeter.gov.uk

Before you complete this survey please make sure you have read our draft Community Asset Transfer Policy.

Part 1: About you and your organisation

Q1 Are you responding as

15 An individual

12 Organisation

Q2 Are you a resident of Exeter?

15 Yes

0 No

Q3 Are you involved in any local community group?

9 Yes

6 No

Please specify

9

Q4 Name of your organisation

12

Q5 If the organisation is based in, or delivering in Exeter please give a full post code?
12

Q6 How would you best describe the type of organisation you represent?

- 6 Charity
- 3 Community / Voluntary Group
- 3 Social Enterprise
- 0 Co-operative
- 0 Private enterprise
- 0 Public agency
- 0 Other

Please specify

0

Q7 How would you best describe the type of work and purpose your organisation?

- 7 Community Engagement
- 1 Health & Social Care
- 0 Fitness & Wellbeing
- 0 Young People
- 0 Older People
- 0 Social Equality
- 0 Environmental
- 0 Children & Families
- 1 Skills Development
- 0 Arts and Culture
- 3 Other

Please specify

0

Part 2: The Aims of the Council's Community Asset Transfer Policy

The Community Asset Transfer policy aims to deliver a range of benefits; to strengthen communities, to support the work of the Council, and to enable the sustainability and impact of the recipient organisation. (This refers to section 6 of the draft policy)

Q8 To what extent do you agree that Exeter City Council should have a Community Asset Transfer Policy in place?

20 Strongly agree

3 Agree

3 Neither agree nor disagree

0 Disagree

1 Strongly disagree

Q9 Please add any comments you wish to make

10

Q10 For each following nine statements of benefit, please indicate to what extent you think the policy, when implemented, has the potential to help to deliver each of them. (See section 6.2 of the draft policy)

	Strongly agree	Agree	Neutral/ unsure	Disagree	Strongly disagree
Improve wellbeing & reduce social isolation	14	6	6	0	1
Provide area-wide benefits for the residents of Exeter	12	8	6	0	1
Support a more sustainable voluntary and community sector	16	5	4	0	1
Nurture economic development & social enterprise	8	10	7	2	0
Create improvements to local services & create new services	11	9	6	0	1
Represent good value for money	8	10	8	0	1
Attract additional investment and new external sources of funding	7	15	4	1	0
Grow the resilience and self-reliance of communities	13	7	6	0	1
Help the Council to achieve its strategic priorities	8	8	11	0	0

Q11 Please add any comments here

9

Q12 If your organisation were able to procure a desired asset transfer, please indicate which would be your top three priorities from the list of potential impacts/benefits that you could achieve as a result of acquiring the asset: (Select only three of the nine options):

- 22 Improve wellbeing & reduce social isolation
- 11 Provide area-wide benefits for the residents of Exeter
- 13 Support a more sustainable voluntary and community sector
- 2 Nurture economic development & social enterprise
- 8 Create improvements to local services & create new services
- 3 Represent good value for money
- 5 Attract additional investment and new external sources of funding
- 12 Grow the resilience and self-reliance of communities
- 2 Help the Council to achieve its strategic priorities

Q13 Please add any comments here

5

Part 3: The Underpinning Principles of the Community Asset Transfer Policy

The City Council policy on Community Asset Transfer is underpinned by a number of practical principles to ensure good practice, equality of opportunity and transparency of the process involved. (Refers to section 7 of the draft policy)

Please indicate to what extent you support these principles set out in the questions below.

Q14 Any proposed asset transfer to the community will need to demonstrate that it will compliment and help to support the vision, aims and priorities of the Council as set out in its Corporate Plan.

- 5 Strongly agree
- 16 Agree
- 5 Neutral
- 0 Disagree
- 0 Strongly disagree

Q15 Please add any comments here

5

Part 4: The Criteria to be adopted for assessing individual applications for Community Asset Transfer (Section 8 of the draft policy)

The decision as to whether the Council will be able to support and progress a proposed Community Asset Transfer will involve the assessment of a number of criteria aimed at understanding the potential costs and benefits arising from:

- Benefits to respective parties e.g. Council, community organisation, generated by the transfer of the asset to the community
- Loss of any existing income for the Council
- Potential loss of future income arising from transfer
- Retention of assets for direct service delivery

There is further detailed guidance about the assessment criteria in the policy. However for the purposes of this survey, the four over-arching criteria are set out in questions below.

For each criteria we ask that you indicate your support or not, and submit any additional comments or queries to help us to better understand your position.

Q16 **Criteria 1:** The Council will need to determine that the asset is available for transfer, fit for purpose and would not impose an unreasonable liability to the voluntary sector organisation or the Council, and that a robust plan is in place to address any such issues or liabilities.

- 16 Strongly agree
- 8 Agree
- 2 Neutral
- 0 Disagree
- 1 Strongly disagree

Q17 Please add any comments here

7

Q18 **Criteria 2:** The applicant will need to demonstrate that the organisation is appropriately constituted For example; a registered charity, a Community Interest Company (CIC); a Community Benefit Society, a co-operative etc. In addition, the constitution should allow for the management/ownership of buildings and for the provision of services.

- 20 Strongly agree
- 4 Agree
- 3 Neutral
- 0 Disagree
- 0 Strongly disagree

Q19 Please add any comments here

6

Q20 **Criteria 3:** The applicant will need to demonstrate a defined community of benefit to the proposed transfer and that the transfer will help to deliver the strategic priorities of the Council.

16 Strongly agree

6 Agree

2 Neutral

1 Disagree

0 Strongly disagree

Q21 Please add any comments here

6

Q22 **Criteria 4:** The applicant will need to demonstrate that they have a clear rationale for the asset transfer backed by a robust business case which illustrates their ability to manage the asset effectively and sustainably.

17 Strongly agree

8 Agree

1 Neutral

1 Disagree

0 Strongly disagree

Q23 Please add any comments here

6

Part 5: In Conclusion...

Q24 The draft policy which you have been helping us to develop by participating in this survey, aims to set out a clear "route map" to enable, where appropriate, community led asset transfer from Exeter City Council to the voluntary, community and social enterprise sector. Please indicate if you think the draft policy achieves this aspiration?

2 Strongly agree

15 Agree

8 Neutral

1 Disagree

0 Strongly disagree

Q25 Please add any comments here

7

Many thanks for taking the time to complete this survey and sharing your opinions with us – they are highly valued.

Q26 If you would like to be kept informed about the further development and launch of this policy, please provide an email contact below:

16

For more information or queries about this survey or policy, please contact: ecwt@exeter.gov.uk

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Community Asset Transfer

This report was generated on 20/08/21. Overall 27 respondents completed this questionnaire. The report has been filtered to show the responses for 'All Respondents'.

The following charts are restricted to the top 12 codes. Lists are restricted to the most recent 100 rows.

Are you responding as



Are you a resident of Exeter?



Are you involved in any local community group?



Please specify

- Member of Topsham Community Association, Topsham Museum and Topsham Community Tennis
- Bury meadow
- Ludwell Life
- Exeter City Life Church, Stoke Hill Community Association, Stoke Hill PTFA
- Local community/composting group in Castle Mount
- Exeter Community Energy, Topsham Community Association
- Exeter Drama Company
- St Thomas Together. St Thomas Community Association.
- Cowick Wellbeinbg Hub

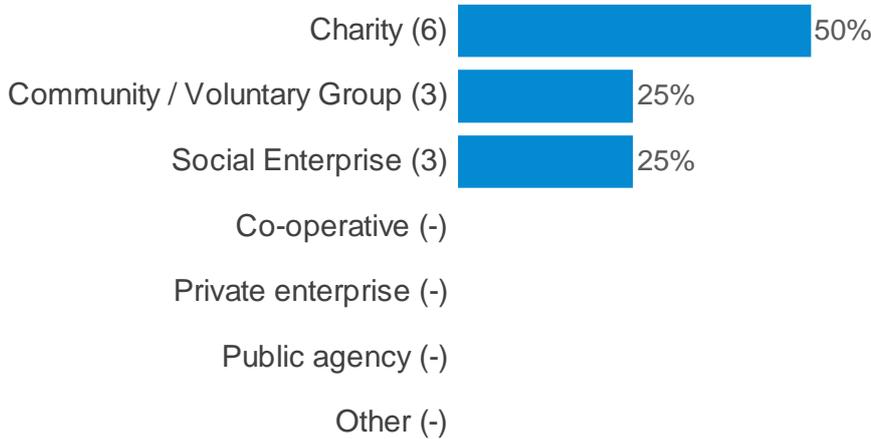
Name of your organisation

- Freemoovement
- Park Life Heavitree
- Estuary League of Friends
- The Nest Southwest Community Interest Company
- Exeter Community Alliance
- Wonford Community and Learning Centre Ltd
- Alphington Community Association
- Isca Community Enterprises
- Topsham Community Association
- Exeter Respect Clc
- Newcourt Community Association
- Wood for Good Exeter

If the organisation is based in, or delivering in Exeter please give a full post code?

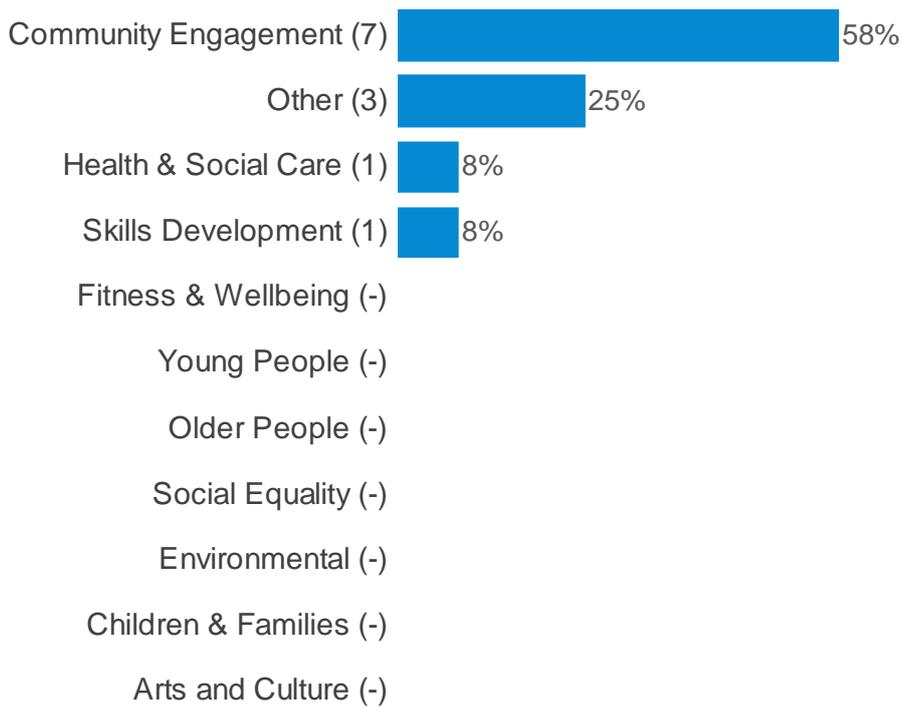
ex2 9ej	EX2 8UP
EX13DS	EX4 8LZ
EX3 0DX	EX3 0HF
EX4 8LZ	Exeter
No premises yet. Current hq is EX6 6LQ	E2 7FN
EX2 6NF	ex4 6rd

How would you best describe the type of organisation you represent?

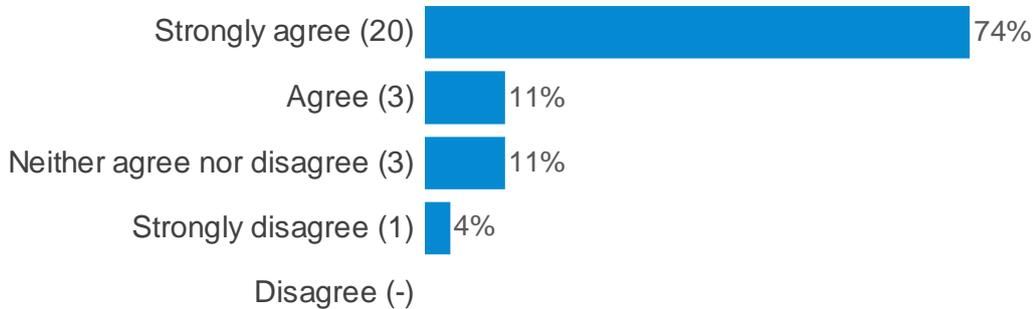


Community Asset Transfer

How would you best describe the type of work and purpose your organisation?



To what extent do you agree that Exeter City Council should have a Community Asset Transfer Policy in place?



Please add any comments you wish to make

This is about cost saving, and not delivering good public service.

More greenery, protect green spaces from development

Is this basically a money saving exercise? What safeguards are there should the recipient organisations fail to deliver the stated aims of

It is really important a CAT policy is in place to make it easier, especially for organic or start up or informal community groups to play

.

If a facility is available for a community group to manage, it may sometime need the support of the City Council to navigate through some

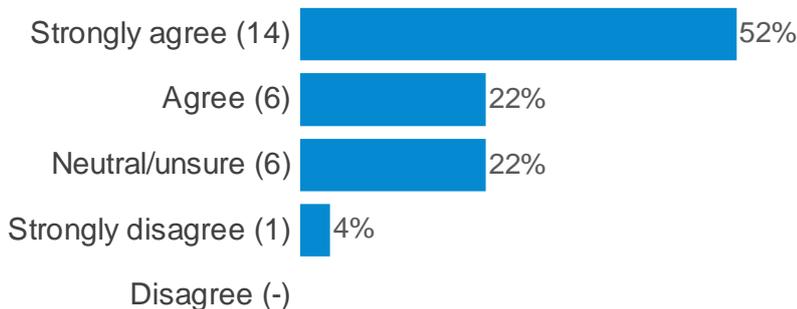
A policy makes the process transparent

Community type providers are in a good place to take on community assets and run them for their community - but not to be entered into lig

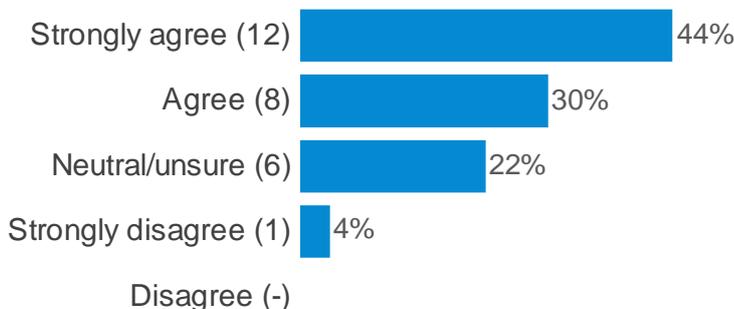
Not sure about it, in one hand it is good idea, however the risk is the access to those building, if is run by one origination then this m

as long as these buildings then do not become a closed shop life long lease / ring fenced rent funded -restricting others / new organisati

For each following nine statements of benefit, please indicate to what extent you think the policy, when implemented, has the potential to help to deliver each of them. (See section 6.2 of the draft policy) (Improve wellbeing & reduce social isolation)

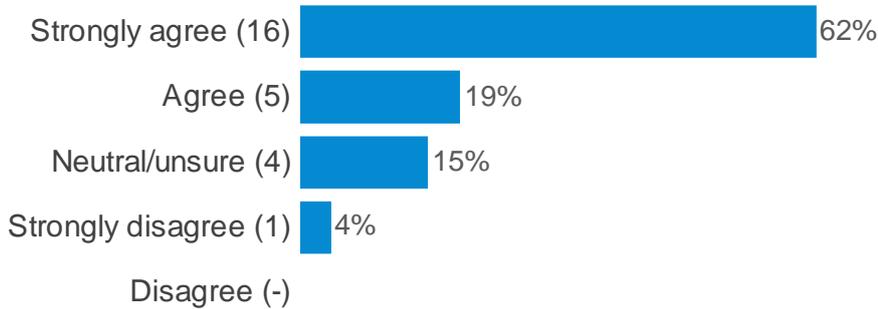


For each following nine statements of benefit, please indicate to what extent you think the policy, when implemented, has the potential to help to deliver each of them. (See section 6.2 of the draft policy) (Provide area-wide benefits for the residents of Exeter)

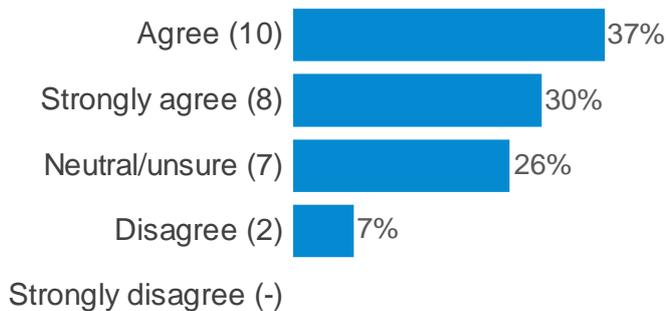


Community Asset Transfer

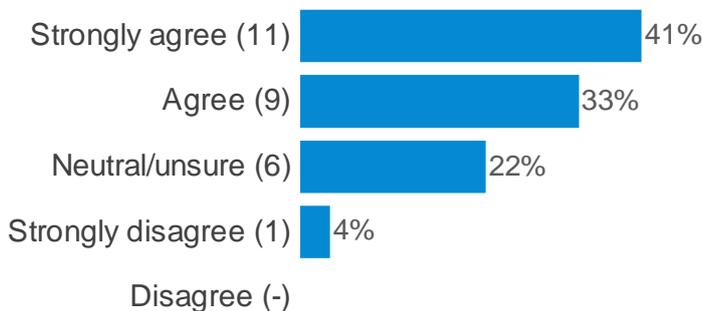
For each following nine statements of benefit, please indicate to what extent you think the policy, when implemented, has the potential to help to deliver each of them. (See section 6.2 of the draft policy) (Support a more sustainable voluntary and community sector)



For each following nine statements of benefit, please indicate to what extent you think the policy, when implemented, has the potential to help to deliver each of them. (See section 6.2 of the draft policy) (Nurture economic development & social enterprise)

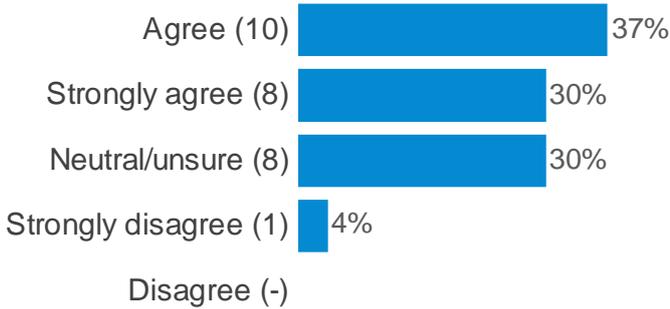


For each following nine statements of benefit, please indicate to what extent you think the policy, when implemented, has the potential to help to deliver each of them. (See section 6.2 of the draft policy) (Create improvements to local services & create new services)

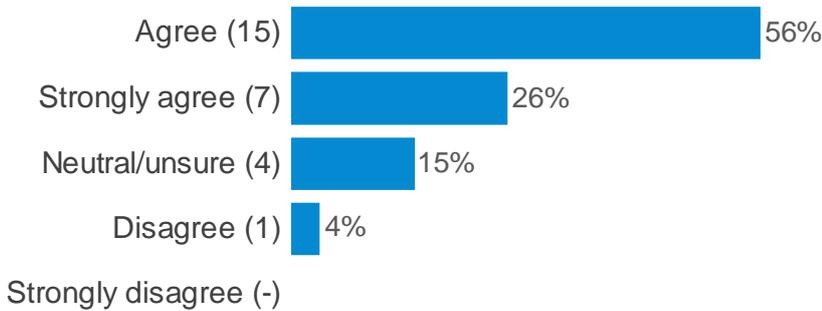


Community Asset Transfer

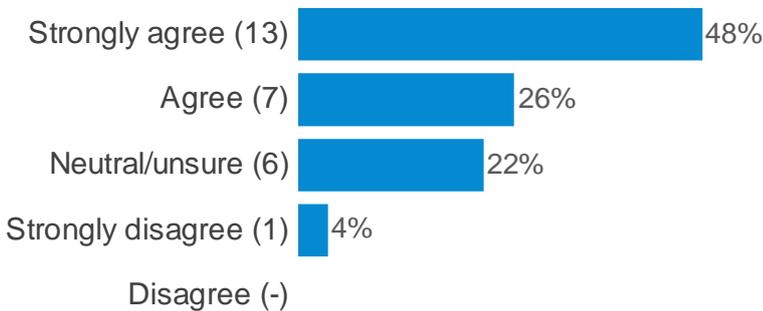
For each following nine statements of benefit, please indicate to what extent you think the policy, when implemented, has the potential to help to deliver each of them. (See section 6.2 of the draft policy) (Represent good value for money)



For each following nine statements of benefit, please indicate to what extent you think the policy, when implemented, has the potential to help to deliver each of them. (See section 6.2 of the draft policy) (Attract additional investment and new external sources of funding)

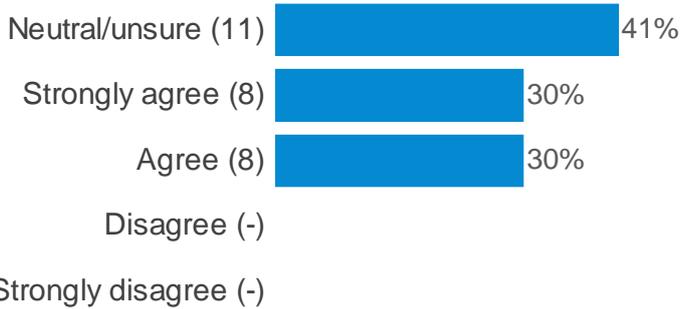


For each following nine statements of benefit, please indicate to what extent you think the policy, when implemented, has the potential to help to deliver each of them. (See section 6.2 of the draft policy) (Grow the resilience and self-reliance of communities)



Community Asset Transfer

For each following nine statements of benefit, please indicate to what extent you think the policy, when implemented, has the potential to help to deliver each of them. (See section 6.2 of the draft policy) (Help the Council to achieve its strategic priorities)



Please add any comments here

Leading questions, not objective design

The 'good value for money' question is hard to answer - long term there should be benefits that may be hard to fully quantify in monetary

I agree with the principle that the council should empower and support communities to address their own (self-identified, if possible) iss

.
Volunteers are sometimes hard to find and the responsibilities associated with undertaking a big commitment requiring sustained effort can

No priorities about climate or environment are mentioned and should be considered.

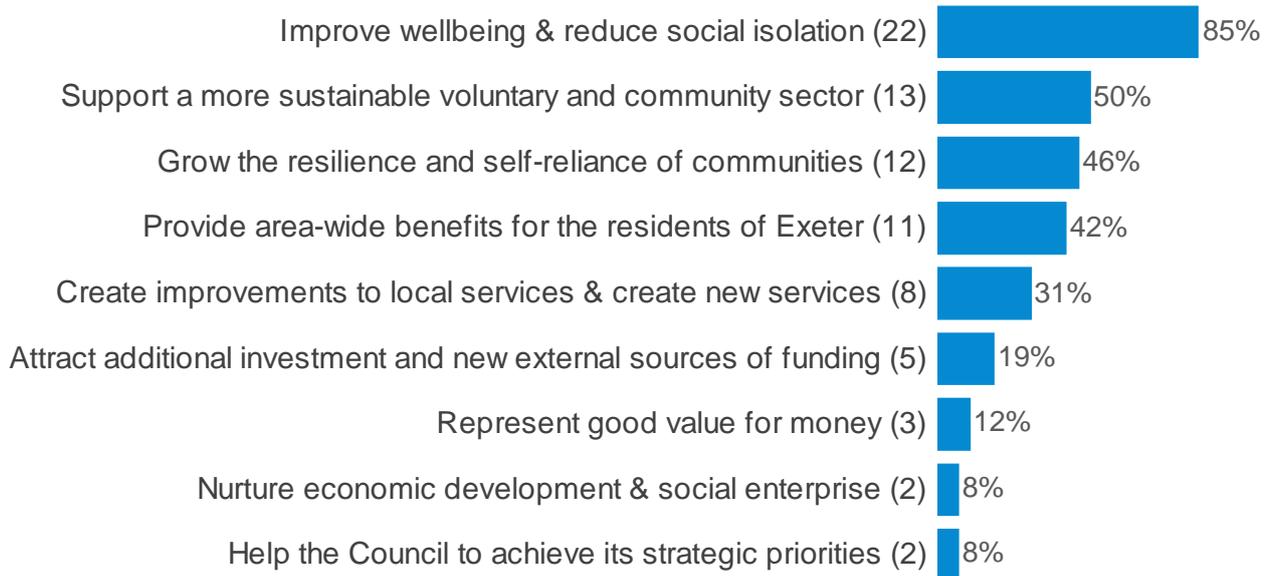
I can't comment, I don't see the point in commenting, first and most who is your targets, What communities are we talking about, there are

While I believe the policy has many positive benefits for communities, services and the council, the workload placed upon volunteers is hu

demands on the few individuals with responsibility within organisations needs to be considered so not to potentially overwhelm

Community Asset Transfer

If your organisation were able to procure a desired asset transfer, please indicate which would be your top three priorities from the list of potential impacts/benefits that you could achieve as a result of acquiring the asset: (Select only three of the nine options):



Please add any comments here

the community groups that I am in have a great impact on a street level or in a in-form way, but would struggle to widen their reach becau

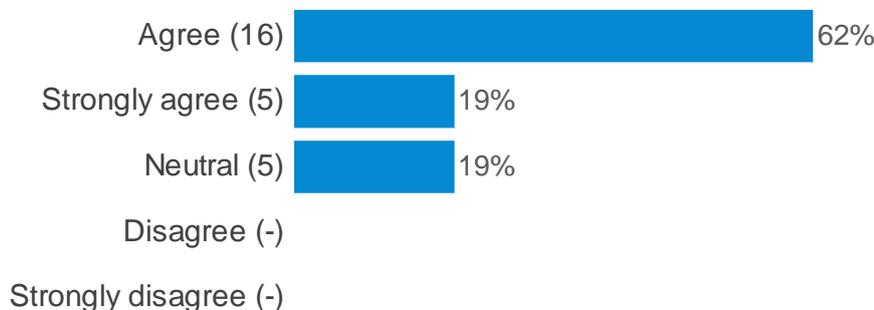
This requires a prolonged commitment to a project which can be off-putting to many

If the asset was land then there might be environmental/ climate benefits.

have to work 'with' communities in partnership rather than 'doing to' . more empahsis on enabling people

Once again, if our organization would had access to an asset transfer, because of the nature of our organization, we shall be inclusive co

Any proposed asset transfer to the community will need to demonstrate that it will compliment and help to support the vision, aims and priorities of the Council as set out in its Corporate Plan.



Please add any comments here

What if it fails in the longer term? Who will police this?

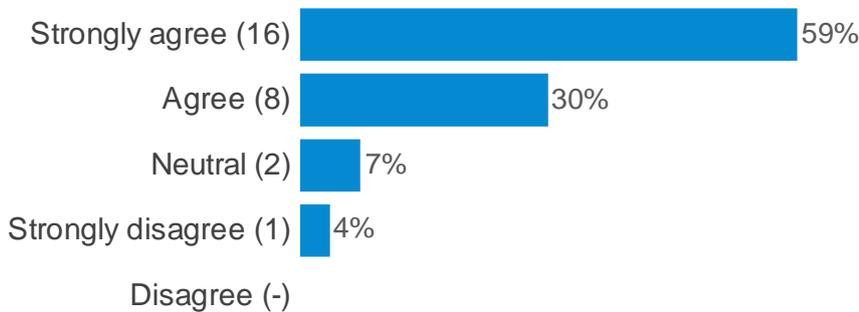
I think under the heading of culture I would be more intentional about including a value in people being free to explore and develop their

The council can access many experts to facilitate any concerns, which would need to be made available for any undertaking by volunteers

1. All CAT should be approved by Council, so there's a transparent process of approval

The Council has to remain the owner of the building is better to run by organizations. We need the Council to monitor the access. How you

Criteria 1: The Council will need to determine that the asset is available for transfer, fit for purpose and would not impose an unreasonable liability to the voluntary sector organisation or the Council, and that a robust plan is in place to address any such issues or liabilities.



Please add any comments here

Where will the governance and accountability be derived if delivered by non professional community groups?

I think it is really important that things are fit for purpose but also that it doesn't get overly bogged down with red tape and health an

Particularly when buildings are involved, the responsibility can be daunting

What criteria will be used to determine if an asset is available, Could an organisation make a request?

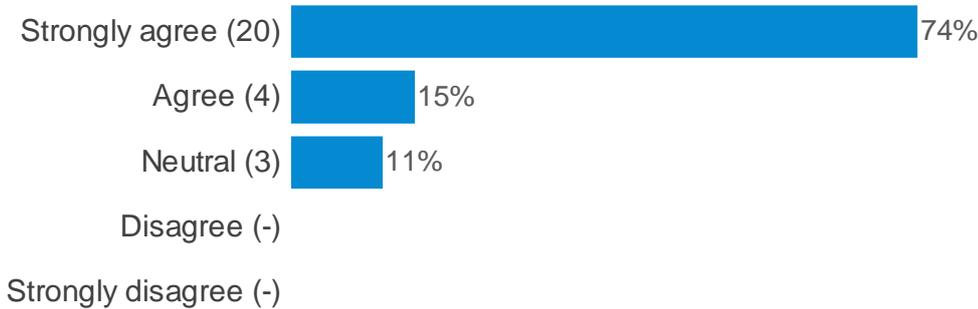
there needs to be clarity and understanding that the voluntary secor organisation cannot sustain financial losses or place too much risk ,

As a manager of a community asset I would note that most organisations that hold leases for community assets pay rent to the city council,

organisation needs to have done due diligence on costs associated with running a building including insurance, bookings, building manager,

Community Asset Transfer

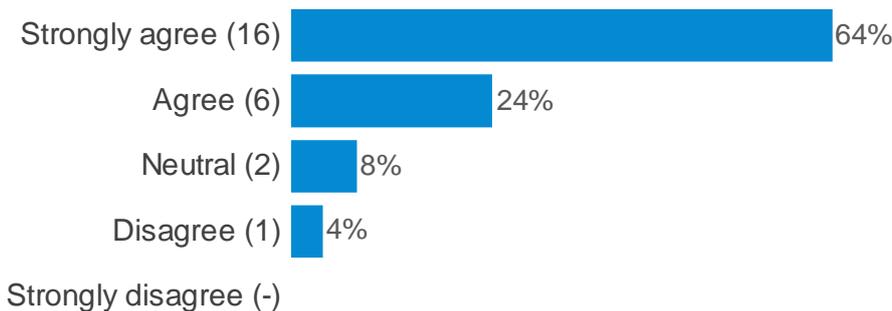
Criteria 2: The applicant will need to demonstrate that the organisation is appropriately constituted For example; a registered charity, a Community Interest Company (CIC); a Community Benefit Society, a co-operative etc. In addition, the constitution should allow for the management/ownership of buildings and for the provision of services.



Please add any comments here

- Sometimes this cannot be determined at the outset, and needs to be established at a later stage in the transfer process.
- while I think this is a good point for larger assets like huge building and expensive assets. I think there might be call for some groups
- The charity also needs to be Incorporated
- Must be a locally based organisation with local community members/ directors from Exeter.
- a given. Have to have a properly constituted organisation for purposes of good governance and financial oversight . plus implications for
- would also suggest a minimum number of trustees are part of each organisation to ensure role specific tasks are achievable -

Criteria 3: The applicant will need to demonstrate a defined community of benefit to the proposed transfer and that the transfer will help to deliver the strategic priorities of the Council.



Please add any comments here

How will this be monitored? And how it easy will it be for the council to take appropriate action if the approach is not working?

While I broadly agree with the Council's strategic priorities as defined in the draft plan I would prefer to see them named explicitly rat

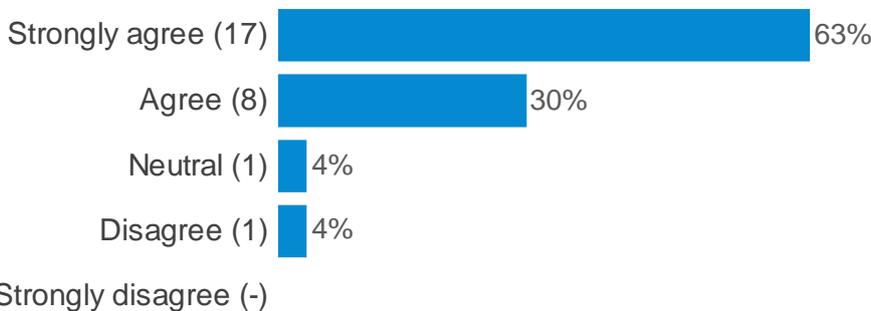
It should be to benefit the community, not the council

Should include land as well as buildings and climate/ecological priorities.

and the voluntary organisation has to meet its own requirements re 'public benefit test' and it's own constitutional requirements

Help with calculating social value would be useful

Criteria 4: The applicant will need to demonstrate that they have a clear rationale for the asset transfer backed by a robust business case which illustrates their ability to manage the asset effectively and sustainably.



Please add any comments here

This sounds like a lot of wrk which may pit some good willing charitable groups off. As with the previous comment, maybe that needs to be

again I think this sounds reasonable for large and very expensive assets, but I'm not sure if there are smaller more low key assets then I

I feel there should be provision for support for organisations who perhaps don't have a strong background in the financial and legal mecha

The Council should support business planning & set out clear criteria against which it will be assessed.

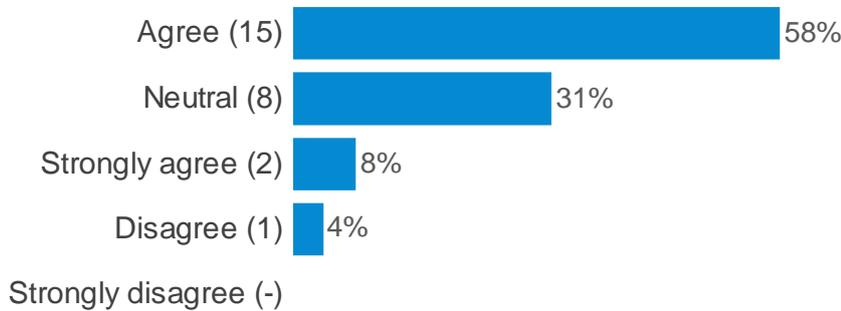
some groups may need support in writing business cases - both financial and people support to do this well

many will need assistance with this as would not normally be part of their makeup

Community Asset Transfer

The draft policy which you have been helping us to develop by participating in this survey, aims to set out a clear “route map” to enable, where appropriate, community led asset transfer from Exeter City Council to the voluntary, community and social enterprise sector.

Please indicate if you think the draft policy achieves this aspiration?



Please add any comments here

Inadequate explanation why the council does not have capacity to fulfil its responsibilities towards the community.

Not read document

The management of assets can be a large financial undertaking and time commitment. Some may require extensive business and other expertise

I think there also is call for ECC to consider flexible use of their Assets for shorting "pop up" events that community groups want to run

council must provide relevant info e.g.past running costs etc to help biz planning

seems ok . at times it was a bit wordy and could things be simplified a bit? Quite alot of legal stuff, which is neccessary to a point , b

I agree flexibility is required and this policy allows for that.

Equality Impact Assessment – Community Asset Transfer

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Introduction

Community Asset Transfer is the transfer of management and /or ownership of public land and buildings from its owner (in this case the local authority) to a community organisation (such as a Charitable Organisation, a Community Interest Company or Social Enterprise) to achieve a local social, economic or environmental benefit.

The Council could expect to be seeking the following benefits from community asset transfers:

- Neighbourhoods that support wellbeing and reduce social isolation
- Area wide benefits for the residents of Exeter City Council
- A sustainable voluntary and community sector
- Economic development and social enterprise
- Improvements to local services
- Value for money
- Delivery of Corporate Plan priorities

Stakeholders: Community and Voluntary Sector

Main beneficiaries of the new programme are:

- Benefits to the local community: these can arise from: building confidence and capacity; attracting new investment and reinvigorating the local economy; and securing stronger, more cohesive and sustainable communities.
- Benefits to the Council and other public sector service providers: these can arise from the creation of a new partner able to tap into additional resources; the ability to engage with a more cohesive local community; new service provision complementing and augmenting statutory services
- Benefits to the organisations taking management: these can include: financial security; increased recognition; power; management capacity and organisational development, and through having a secure base opportunities to expand and diversify.

Consultation

A survey will be promoted on the council website with targeted information to community groups across the city. No specific activities will be targeted at people with protected characteristic within the consultation programme but a wide range of community and voluntary organisations will be invited to participate in the online questions made available through council website and social media channels.

For each of the areas below, an assessment has been made on whether the policy has a **positive, negative or neutral impact**, and brief details of why this decision was made and notes of any mitigation are included. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact – some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest		Impact
Race and ethnicity (including Gypsies and Travellers; migrant workers asylum seekers etc.)	The proposals for a more open, transparent and more accessible process will open up opportunities for these organisations to benefit from Community Asset Transfer where appropriate in the future.	Positive
Disability (as defined by the Equality Act - a person has a disability if they have a physical or mental impairment that has a substantial and long-term	The proposals for a more open, transparent and more accessible process will open up opportunities for these organisations to benefit from Community Asset Transfer where appropriate in the future.	High

<p>adverse effect on their ability to carry out normal day-to-day activities. This can include mental health conditions, long term illnesses such as cancer and HIV, cognitive issues, learning disabilities and sensory impairments)</p>		
<p>Sex/Gender</p>	<p>The proposals for a more open, transparent and more accessible process will open up opportunities for these organisations to benefit from Community Asset Transfer where appropriate in the future.</p>	<p>High</p>
<p>Gender reassignment</p>	<p>The council does not currently provide any grant to organisations that specifically work with, provide services for people or are led by people who have undergone gender reassignment. The proposals for a more open, transparent and more accessible process will open up opportunities for these organisations to benefit from Community Asset Transfer where appropriate in the future.</p>	<p>Positive</p>
<p>Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions)</p>	<p>The council cannot provide resources for specific religion or beliefs, however the proposals for a more open, transparent and more accessible process will open up opportunities for these organisations to benefit from Community Asset Transfer where appropriate in the future.</p>	<p>Positive</p>
<p>Sexual orientation (including heterosexual, lesbian, gay, bisexual)</p>	<p>The proposals for a more open, transparent and more accessible process will open up opportunities for these organisations to benefit from Community Asset Transfer where appropriate in the future.</p>	<p>Positive</p>
<p>Age (children and young people aged 0 – 24, adults aged 25 – 50, younger older people aged 51 – 75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).</p>	<p>The proposals for a more open, transparent and more accessible process will open up opportunities for these organisations to benefit from Community Asset Transfer where appropriate in the future.</p>	<p>Positive</p>
<p>Community relations</p>		

Human Rights		
Action	By when	
On line survey with community groups in the city	June 2021	

Officer: Dawn Rivers Communities Programme Manager
11 August 2022

REPORT TO EXECUTIVE

Date of Meeting: 6 September 2022

REPORT TO COUNCIL

Date of Meeting: 18 October 2022

Report of: Director – Net Zero and City Management

Title: Food Law and Health and Safety Enforcement Service Plan 2022 - 2023

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

- 1.1 To seek approval for the adoption of the Food Law and Health and Safety Service Plan 2022-23. This statutory plan sets out the Council's regulatory function in respect of food safety and health and safety over the forthcoming year.

2. Recommendations:

- 2.1 That Executive supports the Food Law and Health and Safety Service Plan 2022-23 and RECOMMENDS that Council approves:
- (a) the Food Law and Health and Safety Service Plan 2022/23; and
 - (b) the Service Lead – Environmental Health and Community Safety being authorised to change the plan in the light of national guidance and/or to meet operational needs.

3. Reasons for the recommendation:

- 3.1 The Food Standards Agency Framework Agreement requires the Council to produce a Food Law Enforcement Plan (referred to as the Enforcement Plan). The key aim of the plan is to demonstrate how the Council will fulfil its regulatory obligations in respect of its food safety service.
- 3.2 Section 18 of the Health and Safety at Work, etc. Act 1974 places a duty on the Council to make adequate arrangements for enforcement of health and safety. The Health and Safety Executive (HSE), requires the Council to produce an annual Health and Safety Service Plan. Responsibility for Health and Safety at Work enforcement lies with the HSE and Local Authorities (LAs). Councils are generally responsible for enforcement at premises in which non-industrial activities are

undertaken (e.g. retail premises, warehouses, offices etc.) whilst HSE is responsible for industrial activities.

3.3 The Food Law and Health and Safety Service Plan Statutory Service Plan incorporates:

- the service aims and objectives;
- the Action Plan for 2022/23; and
- the financial arrangement for providing the service.

4. What are the resource implications including non financial resources.

4.1 The Action Plan will be carried out within the existing resource allocation as detailed in both the Statutory Service Plan and Revenues and Estimates for 2022/23.

4.2 There are no reductions, restructuring and/or redundancy implications as the key changes identified in this report do not give rise to any additional resource requirements as changes are to existing processes. However, in delivering to the changed requirements there may be some training implications for existing staff.

5. Section 151 Officer comments:

5.1 There are no additional financial implications for Council to consider contained in this report.

6. What are the legal aspects?

6.1 The Food Standards Agency Framework Agreement requires the Council to produce a Food Law Enforcement Plan (referred to as the Enforcement Plan). The key aim of the plan is to demonstrate how the Council will fulfil its regulatory obligations in respect of its food safety service. In the current Framework Agreement and Code of Practice, the Food Standards Agency indicates that full compliance with all inspection frequencies will be expected

6.2 Section 18 of the Health and Safety at Work, etc. Act 1974 places a duty on the Council to make adequate arrangements for enforcement of health and safety. The Health and Safety Executive (HSE), requires the Council to produce an annual Health and Safety Service Plan. Responsibility for Health and Safety at Work enforcement lies with the HSE and Local Authorities (LAs). Councils are generally responsible for enforcement at premises in which non-industrial activities are undertaken, whilst HSE is responsible for industrial activities.

7. Monitoring Officer's comments:

This report raises no issues for the Monitoring Officer

John Street (Deputy Monitoring Officer)

8. Report details:

Key Achievements in 2021/22:

8.1 Programmed Interventions

Coronavirus restrictions from April 2020 onwards prevented the completion of a large number of planned food interventions.

The service inspected 438 food businesses during the year, prioritising those which were either considered high risk or that were new businesses that had not received a previous inspection by the service.

The Food Standard Agency's Recovery Plan sets out how local authorities should resume food interventions post-Covid. The planned intervention programme from October 2021 to the end of March 2023 is as follows:

- All Category A food businesses to receive an onsite intervention by 31 March 2022 – this has been complied with in Exeter
- All Category B food businesses to receive an onsite intervention by 30 June 2022 – this has been complied with in Exeter.
- Less than broadly compliant Category C food businesses (i.e. those with a food hygiene rating of 0-2) to receive an onsite intervention by 30 September 2022 – the service is on course to achieve this at the time of writing this report.
- Less than broadly compliant Category D food businesses (i.e. those with a food hygiene rating of 0-2) to receive an onsite intervention by 31 December 2022
- Broadly compliant Category C food businesses (i.e. those with a food hygiene rating of 3-5) – where the premises has two consecutive ratings of 5, one intervention may be missed (i.e. the intervention moved forward 18 months)
- Other broadly compliant Category C food businesses to receive an onsite intervention by 31 March 2023
- Broadly compliant Category D food businesses – no intervention unless intelligence suggests an increased risk.
- Category E food businesses – no intervention unless intelligence suggests an increased risk.
- Where resources allow, interventions will be undertaken in line with the Food Law Code of Practice, starting with broadly compliant Category D food businesses.

8.2 Service Requests

Environmental Health and Community Safety is responsible for investigating complaints relating to food safety, health and safety regulation, infectious disease control and also for providing health promotion and training activities for businesses. 584 such requests were received by the service during 2021/22.

8.3 Sampling

The authority participates in national and local food-sampling initiatives to monitor the quality of food on sale in the City which is classified as satisfactory, unsatisfactory or unacceptable. Additional samples are taken in response to food complaints and where it is alleged a premises or foodstuff is implicated in a food poisoning incident.

75 food samples were conducted along with 6 monthly sampling of all swimming pools within the city.

8.4 Control and Investigation of Outbreaks and Food Related Infectious Diseases

The service is responsible for the investigation of outbreaks and food related infectious diseases in the City.

Whilst the service has adequate resources to deal with its workload on a day to day basis large scale outbreak requiring an extensive investigation put pressures on the service which can have an impact on the completion of the annual service plan.

73 infectious disease notifications were received by the service in 2021/22, 58% of which related to Campylobacter – the most common cause of bacterial foodborne illness in the UK. Five E.coli O157 (a bacteria which can cause severe food poisoning symptoms) cases were investigated, including a food handler who required exclusion from their job until recovered.

Devon County Council's Tactical Management Group notified the service of 98 potential Covid outbreaks with links to workplaces.

A total of 28 letters were delivered by hand to confirmed Covid cases in Exeter with whom Devon County Council's Test and Trace team had been unable to establish contact.

8.5 Primary Authority

The service currently has 7 active Primary Authority Partnerships.

8.9 Proposed key activities for 2022/23

8.9.1 Maintain high standards in food safety by:

- Achievement of the inspection programme outlined in the FSA's Covid Recovery Plan (see 5.3.4 for details).
- Continuing to maintain high level (>97%) of broadly complaint food businesses in the city.
- Enhanced coaching/sampling/training for non-complaint businesses, with caution/prosecution as final action for those who continually flout the law.
- Continuing with an intelligence-led food sampling programme

8.9.2 Promote safer workplaces by

- Focussing on the duty to manage asbestos, commercial gas safety and outdoor electrical safety during routine food hygiene inspections whenever appropriate.
- Continuing to provide advice and guidance to business to ensure high Covid-19 standards are being maintained.
- Carrying out an audit of Exeter tattooists to ensure that good standards of health, safety and infection control are maintained

- Continuing to conduct water quality sampling of swimming pools and private water supplies.
- 8.9.3 Co-ordinate multi-agency visits where migrant worker/modern slavery issues are suspected or identified
- 8.9.4 Review and refresh the means of business engagement and training using innovative means to help business recover.
- 8.9.5 To investigate further Primary Authority Partnership opportunities for the service.

9. How does the decision contribute to the Council's Corporate Plan?

- 9.1 The Food Law and Health and Safety Service Plan 2022-23 contributes to all aspects of the Council's Corporate Plan.

10. What risks are there and how can they be reduced?

- 10.1 The Service Plan specifies targets and priorities to manage risk and establishes staffing levels to achieve the necessary outcomes. The main risk of not achieving the areas outlined in the service plan will be that of public safety, which could lead to serious injury, ill health or death.

11. Equality Act 2010 (The Act)

- 11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:
- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
 - advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
 - foster good relations between people by tackling prejudice and promoting understanding.
- 11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.
- 11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.
- 11.4 In recommending this proposal potential impact has been identified on people with protected characteristics as determined by the Act, and an Equalities Impact Assessment has been included in the background papers for Member's attention.

12. Carbon Footprint (Environmental) Implications:

12.1 There are no carbon footprint implications identified in this report.

13. Are there any other options?

13.1 The Food Law and Health and Safety Service Plan must be reviewed on an annual basis as there is a legal duty for the food safety and health and safety elements to be reviewed annually.

Director – Net Zero and City Management, David Bartram

Author: Simon Lane - Service Lead – Environmental Health and Community Safety

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

- 1) Legislative and Regulatory Reform Act 2006
- 2) Food Law Code of Practice
- 3) Standard for Health and Safety Enforcing Authorities
- 4) HSC Enforcement Policy Statement
- 5). The Regulatory Enforcement and Sanctions Act 2008
- 6). Regulator's Compliance Code

Contact for enquires:
Democratic Services (Committees)
Room 4.36
01392 265275



Environmental Health and Community Safety

Food Law and Health and Safety Enforcement Service Plan

2022 – 2023

Drawn up in accordance with the: -

- Food Standards Agency Framework Agreement
- National Local Authority Enforcement Code
- Regulators' Code

Issued by: Simon Lane, Service Lead – Environmental Health and Community Safety

Issue date: June 2022

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1 Introduction

1.1 Introduction

1.1.1 This document forms the basis of the business regulation enforcement functions for the authority and ensures that statutory provision for food law and health and safety enforcement is addressed along with locally identified needs.

1.1.2 The Council has a duty to act as an enforcing authority for food safety and health and safety in premises for which it is responsible. The plan outlines how the Council will undertake that function.

1.1.3 The service plan will help to ensure that the actions of the Council are fair, consistent, open and effective.

1.1.4 The Council recognises the important role it plays promoting and securing the safety and health of those who live, work and visit the City. The key aim of this plan is to demonstrate how the Council will fulfil its statutory obligations in accordance with national guidance set out by the respective regulatory agencies. It includes:

- the Council's aim and objectives;
- information around enforcement services provided by the Council;
- details of the Council's performance management systems;
- information on the performance of the Council

1.2 Access to services

1.2.1 The Environmental Health and Community Safety service is based in the Civic Centre, Paris Street. Service users may contact officers on site or by leaving a message in the following ways:

- online via the Council website;
- in person by appointment at the Customer Service Centre in Paris Street;
- by telephone, 01392 265193 between 09:00am and 5.00pm Monday to Friday;
- whilst there is no formal out of hours service, staff can be contacted in the event of an emergency through the Council's Control Room on 01392 267888 by means of a telephone service;
- by email at environmental.health@exeter.gov.uk

2 Service aims and objectives

2.1 Aims and objectives

2.1.1 The Council's Corporate Plan sets out priorities which aim to meet the needs of our citizens and customers. The priorities are:

- Net Zero Carbon City
- Healthy and Active City
- Great Homes and Neighbourhoods
- Thriving Local Economy
- Leading a well-run council

The corporate plan is available by visiting www.exeter.gov.uk/corporateplan.

2.1.2 In respect of food safety and health and safety the objectives of the Council will:

- undertake appropriate and meaningful regulatory interventions at business and residential premises for which the Council is the enforcing authority and institute informal or formal action in accordance with the Enforcement Policy, Local Government Regulation and national government guidance produced by the Food Standards Agency, Health and Safety Executive and current good practice. Businesses will be targeted, focusing resources on those presenting a high risk to health, the environment or public safety with a view to securing an improvement in legislative compliance;
- investigate complaints about premises and, at the conclusion of investigations, institute informal or legal action as appropriate;
- provide appropriate training and education to local businesses to assist them to meet legislative requirements;
- investigate cases of food-borne and some other infectious diseases and advise upon appropriate precautionary and control measures;
- issue registrations for skin-piercing premises and individuals, monitoring compliance with relevant conditions;
- sample and arrange for microbiological testing of high-risk food products and premises;
- develop Primary Authority partnerships, where relevant, with local businesses;
- provide advice and assistance to businesses to help them comply with legislation and to maintain high standards and
- work in partnership with related organisations to promote the wellbeing of persons living, working or visiting the City.

2.2 Links to corporate purposes and other local and national strategies and plans

2.2.1 The Environmental Health and Community Safety service aims to uphold the core values of how the council works, making sure that they underpin our attitudes and behaviours. Accordingly we will:

- Meet customers' needs with high-quality services
- Be flexible and have a can-do approach
- Show trust and respect
- Tell people what is going on, listen and respond to their views
- Be proud to work for the city and the council

2.2.2 The following represent key aims for the service. The service:

- embraces the principles of excellence in public services and better regulation and will look to make the most effective use of available resources to achieve maximum gain;
- implements the requirements of the Food Law Code of Practice (England) - actively promoting and evaluating the use of effective food safety interventions to facilitate compliance with food law;
- recognises the importance of food and its influence on the wider determinants of health; seeking to work in partnership and play an active role to reduce the inequalities in health in the local population;
- recognises the importance of the National Food Hygiene Rating Scheme which gives each premises a numerical rating based on their food safety management system, structure and confidence in management - this scheme is an important tool in maintaining high compliance of businesses with food hygiene law;
- continues to develop new ways to establish and maintain an effective health and safety culture in the city so that all employers take their responsibilities seriously, the workforce is fully involved, risks are properly managed and employees are protected;
- actively seeks to work with other areas of the Council, businesses and individuals to ensure that economic development within the city is maintained;
- targets work to manage the risk in high-risk, poor-performing and rogue trader businesses. It will be proportionate, consistent and transparent and have suitable monitoring and review systems and
- is mindful of the burdens on local businesses particularly where, for example, the economy is seasonal and subject to fluctuation. The Council will work in partnership with national regulators, local partners and with local businesses offering information, advice and assistance.

2.3 Links to Health and Wellbeing Priorities and Other Plans

2.3.1 The Devon Health and Wellbeing Board has 4 strategic priorities:

- Create opportunities for all-inclusive economic growth, education and social mobility
- Healthy, safe, strong and sustainable communities creating conditions for good health and wellbeing where we live, work and learn.
- Focus on mental health building good emotional health and wellbeing, happiness and resilience
- Maintain good health for all supporting people to stay as healthy as possible for as long as possible.

2.3.2 Whilst there are no specific regulatory targets set out in the above, enforcement will contribute to raising business standards, improving health outcomes and reducing

health inequalities through the delivery of relevant services, in partnership with other agencies.

2.3.3 In addition to this service plan, the service is also responsible for or contributes to the following strategies, policies and plans:

- The Council Enforcement Policy
- The Environmental Strategy
- The Carbon Management Plan
- The Air Quality Strategy
- The Air Quality Action Plan
- The Licensing Act 2003 Statement of Licensing Policy
- Exeter City Council Corporate Plan
- The Exeter Community Safety Partnership Strategy
- Gambling Act 2005 Policy
- Street Trading Policy

3 Background

3.1 Profile of Exeter City Council

3.1.1 The geographical enforcement area is relatively confined in local authority terms covering an area of 4,774 hectares and supporting an estimated residential population of 131,405 persons with 72.8% of working age.

3.1.2 There are a total of 5,111 registered businesses for business rates

3.1.3 Approximately 35,000 people commute to Exeter on a daily basis, with an average footfall in the city centre of 1,364,000 people per month.

3.1.4 Exeter comprises of a mix of residential and commercial properties as well as industrial and trading estates. With Exeter being the regional administrative, cultural and educational centre, the City has a significant impact on the adjacent areas of East and Mid Devon and Teignbridge.

3.1.5 Although set in a predominantly urban area the City offers only a limited range of industry with the main activities being catering, retail sales, office activities, warehousing and distribution. No significant food manufacturing premises are located within the City. There is an increasing variety of ethnic food outlets and fast food takeaway outlets and the food pattern is dynamic.

3.1.6 The City's status as a medical, university, and educational centre means that there are several large institutional catering premises located within the boundary.

3.1.7 There is one approved establishment in the City – a wholesaler re-wrapping bacon and cheese.

3.1.8 Exeter was once a thriving port but the River Exe and ship canal are now used for leisure, rather than trade – the city is no longer a port health authority. Exeter airport is situated within East Devon District Council.

3.1.9 The service embraces the core aims of the FSA's food safety issues (including Imported Food Controls), nutrition and diet issues and sustainability.

3.2 Organisational Structure

- 3.2.1 Environmental Health and Community Safety is within the Portfolio of Services overseen by the Director for Net Zero and City Management, with the Service Lead - Environmental Health and Community Safety responsible for delivering this Service Plan. The Environmental Health and Community Safety Service provides:
- the Food Safety Enforcement function;
 - the investigations of notifiable / infectious disease;
 - the Health and Safety Enforcement function;
 - the Private Water Supply Enforcement function;
 - the Health Act Enforcement function;
 - Sunbed Regulations Enforcement function;
 - Licensing duties in relation to Licensing Act 2003, Gambling Act 2005, taxis and miscellaneous legislation;
 - Regulation of premises under the Environmental Permitting Regulations;
 - Monitoring of the city's air quality;
 - Monitoring and guidance with respect to contaminated land;
 - Investigation of complaints relating to business nuisance;
 - Co-ordination of the council's anti-social behaviour function;
 - Co-ordination of the multi-agency Community Safety Partnership
 - Regulation of Private Sector Housing which includes Mobile Home Parks
 - Housing Grants and Loans
 - Fuel Poverty Strategy
- 3.2.2 Environmental Health and Community Safety Service operates under the Director for Net Zero and City Management.
- 3.2.3 The Service Lead - Environmental Health and Community Safety has various delegations to act on behalf of the Council, with delegated deputies appointed under the Council's constitution. All non-delegated matters are reported to the appropriate committee.
- 3.2.4 The officer structure in respect of the service is detailed in Appendix A and the Council's committee structure is detailed in Appendix B.
- 3.2.5 In consultation with the Service Lead - Legal, the Service Lead – Environmental Health and Community Safety is authorised to deal with the provisions and enforce compliance with legislative areas delegated to the post. This includes the initiation, defence and settlement of legal proceeding, issuing of formal cautions and fixed penalty fines, service of Notices and Orders, the issue, refusal and revocation of licences, certificates and registrations, carrying out works in default and payment and recovery of costs.
- 3.2.6 The Council's Service Lead - Legal has delegated authority for the initiation, defence, settlement and conduct of any legal proceedings which may affect the interests of the Council or the inhabitants of the City.
- 3.2.7 Specialist analytical and microbiological services are provided by external agencies such as the UK Health Security Agency (formally Public Health England), South West Water and Public Analyst Scientific Services.

4 Performance

4.1 Food Safety performance

- 4.1.1 During 2021/22, the service:

- Conducted 438 food hygiene inspections
- 3 requests for food hygiene rating scheme revisits were received and the premises were subsequently revisited
- 98% of food premises within the city were broadly compliant with food hygiene law
- 171 compliance checks / advice visits were conducted
- 73 food poisoning cases were investigated
- 140 service requests / complaints relating to food safety were received
- 75 food samples were taken

4.2 Health and Safety performance

4.2.1 During 2021/22:

- 188 proactive health and safety inspections were undertaken.
- 59 reactive visits were carried out.
- 103 health and safety service requests / complaints were dealt with.
- 97 accident reports have been received and looked into

5 Food Safety

5.1 Scope of the Food Safety Service

5.1.1 The Food Safety Service :

- undertakes programmed food hygiene interventions and revisits;
- registers all food businesses in the City (or approves those businesses supplying products of animal origin to persons other than the final consumer);
- monitors the database;
- undertakes food sampling;
- investigates food complaints;
- assists UK Health Security Agency (formally Public Health England) in investigation of food poisoning and infectious disease outbreak control;
- responds to Food Standards Agency Food Alerts, product withdrawals and recalls;
- provides of export food certificates;
- inspects food;
- runs advisory and training services for businesses and
- promotes food safety.

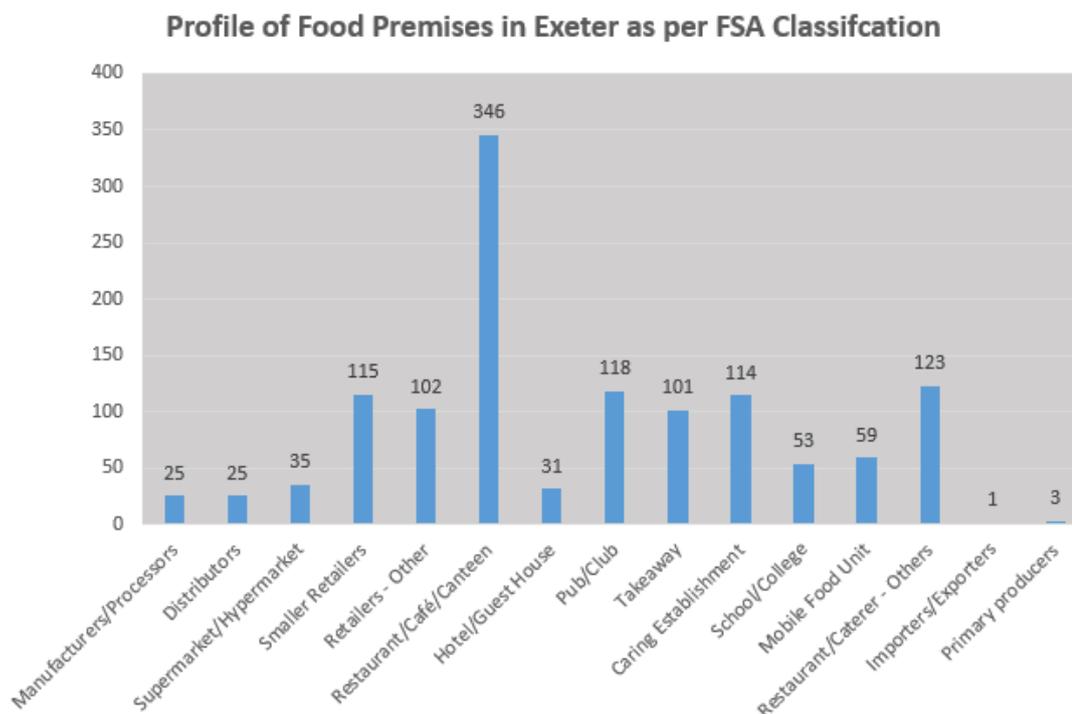
5.1.2 The Council believes in fair regulation and the team uses a variety of means to ensure that individuals and organisations meet their responsibilities including education, negotiation, advice, guidance, warning letters, formal notices and prosecution. Overall the service seeks to work in collaboration with businesses while avoiding unnecessary bureaucracy in the way it works.

5.1.3 The Council supports the Food Standards Agency's *Food You Can Trust* strategy and its 3 guiding principles:

1. Food is safe.
2. Food is what it says it is.
3. Food is healthier and more sustainable.

5.2 Food Business Profile

5.2.1 The current (as at 1 April 2022) profile of food premises in the City as per Food Standards Agency classification is illustrated below:



5.2.2 Following an inspection/audit, food premises are scored and categorised A to E in respect of the risk to food safety in accordance with the Food Law Code of Practice (England). The categories dictate the interval between inspections. For example, category A premises are inspected every 6 months, category D premises are inspected every 2 years. Note that, since the Covid pandemic, all local authorities are operating their food intervention programmes in line with the Food Standards Agency's Recovery Plan – see 5.3.4 for more details.

5.2.3 The current profile of food premises in terms of risk category are shown below:

	A	B	C	D	E	U	Total
01 April 2022	1	25	117	647	399	54	1243

5.2.4 There are a small number of food premises in the City where business owners do not speak English as their first language. This can impact on the ability to successfully inspect premises and to effectively promote food safety. The Food Standards Agency provides food hygiene information in a number of languages to which food business

operators will be signposted whenever appropriate. The Council also aims to provide food hygiene training in other languages if sufficient demand arises.

- 5.2.5 Some food business operators employ a number of migrant workers. Where appropriate, inspecting officers will look for evidence of modern slavery or inadequate accommodation/working conditions and share this intelligence with the appropriate agencies (Police, Border Force etc.).

5.3 Interventions

- 5.3.1 The Council will:

- carry out a range of official and other food controls as set out in the Food Law Code of Practice (England) and its associated Practice Guidance;
- inspect/audit and approve relevant premises in accordance with the relevant legislation, Code of Practice and centrally issued guidance;
- liaise with the Primary Authority of any company whose premises have been inspected and offences identified which are, or appear to be, associated with the company's centrally defined policies and procedures;
- assess the compliance of premises and systems to the legally prescribed standards having due regard to any relevant Industry Guides to Good Hygiene Practice and other relevant centrally issued guidance;
- take appropriate action on any non-compliance found, in accordance with the Council's Enforcement Policy and
- maintain documented intervention procedures and record legible data and information following interventions in a retrievable way.

- 5.3.2 Whilst the primary responsibility for identifying food hazards and controlling risks rests with food business operators, food hygiene interventions will be undertaken to:

- establish whether food is being produced hygienically;
- establish whether food is, or will be, having regard to further processing, safe to eat;
- identify foreseeable incidences of food poisoning or injury as a consequence of consumption of food;
- to issue the relevant rating as laid out in the Food Hygiene Rating Scheme Brand Standard, where the premises is part of the scheme

- 5.3.3 With the foregoing in mind, the main objectives of the interventions programme will be to:

- determine the scope of the business activity and the relevant food safety legislation;
- thoroughly and systematically gather and record information;
- identify potential hazards and risks to public health;
- assess the effectiveness of process controls and HACCP based systems;
- identify specific contraventions of food safety legislation;
- consider appropriate enforcement action (proportionate to risk), to secure compliance with food safety legal requirements;
- produce advice and information and recommend good practice where appropriate;
- promote continued improvements in food hygiene standards to meet national / local performance indicators and the relevant Food Standards Agency strategy; and
- issue the relevant rating as laid out in the Food Hygiene Rating Scheme Brand Standard, where the premises is part of the scheme

- 5.3.4 Coronavirus restrictions from April 2020 onwards prevented the completion of a large number of planned food interventions. Introduced in July 2021, The Food Standard Agency's Recovery Plan sets out how local authorities should resume food interventions post-Covid. The planned intervention programme from October 2021 to the end of March 2023 is as follows:
- All Category A food businesses to receive an onsite intervention by 31 March 2022
 - All Category B food businesses to receive an onsite intervention by 30 June 2022
 - Less than broadly compliant Category C food businesses (i.e. those with a food hygiene rating of 0-2) to receive an onsite intervention by 30 September 2022
 - Less than broadly compliant Category D food businesses (i.e. those with a food hygiene rating of 0-2) to receive an onsite intervention by 31 December 2022
 - Broadly compliant Category C food businesses (i.e. those with a food hygiene rating of 3-5) – where the premises has two consecutive ratings of 5, one intervention may be missed (i.e. the intervention moved forward 18 months)
 - Other broadly compliant Category C food businesses to receive an onsite intervention by 31 March 2023
 - Broadly compliant Category D food businesses – no intervention unless intelligence suggests an increased risk.
 - Category E food businesses – no intervention unless intelligence suggests an increased risk.
 - Where resources allow, interventions will be undertaken in line with the Food Law Code of Practice, starting with broadly compliant Category D food businesses.
- 5.3.5 Recovery Plan progress is reported to the Food Standards Agency via an online survey every three months.
- 5.3.6 A new food hygiene intervention rating scheme is due to be launched by the Food Standards Agency at some point in 2023/24.
- 5.3.7 In order to achieve the inspection programme not less than 3 (FTE) qualified food inspectors will be required. This figure takes no account of the burden of any extra targeted inspection activity, sampling or investigations arising from complaints or Food Alerts, product withdrawals and recalls for example.
- 5.3.8 All officers undertaking inspections, investigating complaints, giving advice and taking samples shall meet the qualifications and experience requirements in the Food Law Code of Practice (England)
- 5.3.9 It is not envisaged that arrangements will need to be made to ensure the Council has access to specialist expertise for the inspection of any specialised processes located in the city.

5.4 Food Complaints

- 5.4.1 Food complaints received and investigated by the service fall into one of the following broad categories:
- food contamination;
 - complaints about food businesses (poor hygiene, pests, lack of food handler training etc.) and
 - food alerts, product withdrawals and recalls.
- 5.4.2 There is an established procedure for dealing with food complaints which sets out the action to be taken regarding investigation. The procedure, together with a food complaints investigation form, is available on RIAMS (The Council's online information management system).
- 5.4.3 The number of food complaints/service requests received annually has been at a constant level over the last few years.
- 5.4.4 It is estimated that 0.2 FTE qualified inspectors will be required to deal with food complaints.

5.5 Primary Authority Partnerships

- 5.5.1 The Regulatory Enforcement and Sanctions Act 2008 established a statutory scheme for businesses trading across local authority boundaries. The scheme known as the Primary Authority Scheme enables businesses and local authorities to enter into formal partnerships. The advice provided by the local authority has to be taken into account by other councils before enforcement action can be taken against the business concerned.
- 5.5.2 Primary Authority partnership agreements have been established with:
1. West Country Family Butchers Ltd.
 2. Devon Norse Ltd.
 3. Andrew Brownsword Hotels
 4. HK4 Group Ltd.
 5. KM Innovations Ltd.
 6. Fresha Ltd
 7. Sacred Grounds (Exeter) Ltd.

5.6 Advice to Business

- 5.6.1 A full suite of food courses is promoted to enable local businesses to fulfil their training requirements. Taught courses and e-learning are both available. See Section 8 for more information.
- 5.6.2 Inspectors provide advice during routine interventions and respond to queries from the public and food businesses.
- 5.6.3 Advice on topics of general and current food safety interest will be placed on the Council web site and social media accounts as necessary.
- 5.6.4 The Council will use local business and other forums as a means to disseminate relevant food safety information to help assess their needs and obstacles to compliance.

- 5.6.5 The service will actively seek participation in or look to co-ordinate appropriate forums to promote food safety and disseminate information.
- 5.6.6 It is estimated that 0.1 FTE qualified food inspectors will be necessary to provide information and advice to food businesses.

5.7 Food Inspection / Sampling

- 5.7.1 The Council will ensure that food is inspected in accordance with relevant legislation, The Food Law Code of Practice (England) and the Practice Guidance (England) and centrally issued guidance and ensure that food meets prescribed standards.
- 5.7.2 UK Health Security Agency (formally Public Health England)'s Coordinated National Sampling projects are determined following consultation on various options with stakeholders. Local sampling studies are also organised via the Devon Food Sub Group.
- 5.7.3 The Council's sampling priorities are detailed in Section 7.
- 5.7.4 Routine sampling will be undertaken by the Environmental Health Officers supported by the Environmental Technical Officer. Activity reports will be submitted on a periodic basis. A procedure has been set up and implemented in respect of taking samples and the arrangements made for Analysis and Examination. A service level agreement is agreed annually between the Council UKHSA's Food, Water and Environmental Laboratory Service.

5.8 Control and Investigation of Food Poisoning Outbreaks and Food Related Infectious Disease

- 5.8.1 Environmental Health and Community Safety's objective in respect of the control of food related disease is to:
- contain the spread of any outbreak;
 - identify the focus of infection;
 - identify the causative organism/chemical;
 - trace carriers and cases;
 - trace the source of infection;
 - determine the causal factors;
 - recommend practices to prevent recurrence of disease and
 - determine whether criminal offences have been committed.
- 5.8.2 Investigations into outbreaks of foodborne illness are carried out in consultation with and under the direction of UK Health Security Agency (formally Public Health England).
- 5.8.3 A Single Case Management Plan has been drawn up between UK Health Security Agency SW and Local Authorities. The plan outlines who will take the lead for investigating single cases of various notifiable diseases and the appropriate method in each case (letter, phone call, visit etc.). Case questionnaires have also been standardised across the district and are available on the Environmental Health Computer System.
- 5.8.4 The Principal Environmental Health Officer (Business Regulation) fulfils the role as lead officer in respect of infectious disease control and it is anticipated that adequate resources exist within the full complement of The Environmental Health and Community Safety service to deal with this service demand.

5.8.5 It is estimated that 0.1 FTE qualified food inspectors will be required to investigate outbreaks and food related infectious diseases.

5.9 Food Safety Incidents

5.9.1 The Council has and will maintain a computer system capable of receiving food alerts, product withdrawals and recalls and will implement the documented procedure for responding to food alerts and food safety incidents received from the FSA, in accordance with the relevant Food Law Code of Practice (England). The current informal out of hours contact arrangements will be used.

5.9.2 Documented responses to the outcome of appropriate food alerts will be in accordance with the adopted procedure.

5.9.3 In the event of any serious localised incident or a wider food safety problem, the Principal Environmental Health Officer (Business Regulation) will notify the FSA.

5.9.4 It is considered that adequate resources exist within the full complement of Environmental Health and Community Safety to deal with this demand.

5.9.5 It is anticipated that 0.1 FTE will be required to deal with food hazard alerts.

5.10 Liaison with Other Organisations

5.10.1 The Council is committed to ensuring the enforcement approach it takes is consistent with other authorities. Regular dialogue on food enforcement matters and food related issues takes place with:

- Primary Authority business partners
- Trading Standards
- Devon Strategic Environmental Health Managers Food Sub-Group
- Health Protection Advisory Group
- Exeter and Heart of Devon Hoteliers & other appropriate business forums
- Chartered Institute of Environmental Health (CIEH)
- University of Exeter
- Exeter College
- Other services within the Council (e.g. Planning & Building Control)
- Devon and Somerset Better Business for All Partnership

5.10.2 In delivering the food service, the Council recognises the increasing importance of partnership working. Examples of this include:

- consultation with businesses and community leaders;
- participation in third party audits, joint sampling initiatives etc.;
- Food Safety Week;
- identify funding opportunities;
- development of food hygiene training;
- providing focused training sessions on nutrition and
- other food related subjects.

5.11 Food Hygiene Rating Scheme and Food Safety Promotion

5.11.1 The service utilises many methods to promote food safety and increasingly is led by the developing body of research. Since April 2011, the service has operated the

National Food Hygiene Rating Scheme which has helped drive improvements in food law compliance. 1149 businesses fall within the scope of the scheme, with all ratings being published on the national web portal at www.food.gov.uk/ratings and businesses encouraged to display stickers. The service will continue to promote usage of the scheme by consumers by harnessing the power and influence of the local media, health promotion initiatives and public events. The service will also continue to encourage at the time of visits voluntary display of rating stickers and certificates at premises that fall within the scope of the scheme.

5.11.2 Food businesses rated 4 or below can request a revisit to rescore, for which a fee is payable. Once the completed application and fee is received, officers will carry out an unannounced inspection within three months.

5.11.3 Numerous promotional activities also occur during the course of a typical year usually in response to need/requests from the different communities in Exeter, for example:

- presentations to schools, interested groups, professional bodies, (e.g. Infection Control Study Days, Chef Focus Group, Exeter Food Festival Members, Early Years providers);
- circulation of advisory leaflets or guidance notes in response to topical issues or changes in legislation;
- Food hygiene awareness sessions targeted a new food business operators.

5.12 Internal Monitoring

Internal monitoring procedures to verify conformance with this Service Plan are well established and will be exercised. These include senior officer auditing, peer review and consistency exercises (including the Food Standard Agency's annual consistency exercise). Team meetings take place weekly via Skype and monthly in person.

5.13 Audit

5.13.1 The Council will participate in third party and peer review processes against this Service Plan and associated procedures.

5.14 Other Services

5.14.1 Environmental Health and Community Safety has responsibility for undertaking a parallel role in respect of other Environmental Health related legislation in commercial premises.

5.14.2 General (non-food related) complaint work will initially be undertaken by the service in accordance with the relevant procedure. Pest control treatment may be undertaken by officers from the section in liaison with the Environmental Health Officer, but only when it will not comprise future enforcement action.

5.14.3 The service seeks to work in partnership with relevant agencies to promote business regulation related matters in the wider context of public health.

5.15 Enforcement Policy

5.15.1 The Council's Enforcement Policy includes the principles contained in the Regulators' Code which the Council is committed to incorporating into its regulatory functions.

5.15.2 The Enforcement Policy will be subject to periodic review at which time amendments will be made to specifically reflect the requirements of the Food Standards Agency

Framework Agreement on Local Authority Food Law Enforcement and other relevant and appropriate guidance.

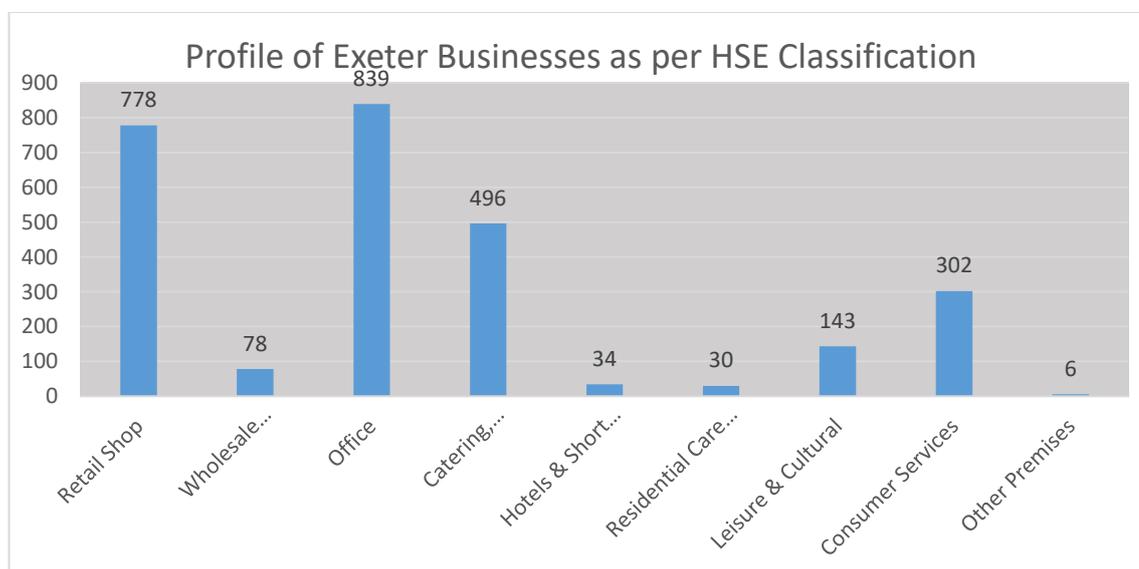
5.15.3 The key elements of the Enforcement Policy are detailed below:

- a belief that enforcement must be firm but fair;
- the need for proportionality in the application of the law;
- showing transparency about how the service operates;
- a need for targeting of enforcement action;
- a need to deliver consistency of approach and
- the need to balance enforcement and education in the way the service works.

6 Health and Safety

6.1 Health and Safety Business Profile

6.1.1 Exeter is predominantly an urban area with many small businesses. Health and safety enforcement is split between the Health and Safety Executive (who enforce the legislation in higher-risk businesses such as manufacturing and construction) and the Council who enforce health and safety in mostly small and lower risk businesses that are predominantly in the service sector. There is no requirement for non-food businesses to register with Environmental Health and Community Safety but as estimate, the Council is responsible for health and safety enforcement in around 2700 premises.



6.2 Health and Safety Intervention Programme

6.2.1 Health and Safety law clearly sets out that the primary responsibility for managing risk to workers and the public who might be affected by work activity lies with the business or organisation that creates the risk in the first place.

6.2.2 The role of the Council is to support, encourage, advise and where necessary hold to account businesses to ensure that they effectively manage the occupational health and safety risks they create. The service uses the guidance given in HELA Circular (67/2 Revision 11) to set its priorities and target its interventions.

6.2.3 As a result of current national and local drivers for change we aim to focus health and safety enforcement resources into areas where they are likely to have the greatest impact. In the coming year, we will continue to concentrate on specific topic areas during proactive interventions and reactive investigations, rather than complete all-encompassing inspections. The areas focussed on have been identified nationally and locally as contributing to the highest rate of accidents/incidents and ill health at work, across all health and safety enforcing authorities.

6.3 Scope of Health and Safety Service

6.3.1 With regard to health and safety, the Council will be directed by the Health and Safety Executive's National Local Authority Enforcement Code issued under Section 18 (4)(b) of the Health and Safety at Work etc. Act 1974. The key elements of the code are:

- Ensuring that the authority takes a risk-based approach to regulation;
- Ensuring that the authority applies proportionate decision making in accordance with the LA's Enforcement Policy Statement and Enforcement Management Model;
- A requirement for the authority to legally appoint suitably qualified staff to carry out the necessary regulatory duties;
- A requirement to produce an annual service plan;

6.3.2 The objective of the health and safety service in contributing to this aim is to ensure that risks to person's health, safety and welfare from work activities are properly controlled through advice and proportionate enforcement.

6.3.3 The service comprises a range of key functions, namely:

- to carry out interventions in line with HELA Circular 67/2 (rev.11), the National Local Authority Enforcement Code and the Devon Health & Safety (Enforcement) Sub Group's annual workplan;
- to take the most appropriate action upon inspection of relevant workplaces including the use of advice, informal correspondence, improvement and prohibition notices and the institution of legal proceedings;
- to educate proprietors of relevant workplaces in health, safety and welfare matters and their legal responsibilities in relation to their occupation by the distribution of leaflets and the provision of advice and information;
- to investigate specific accident notifications;
- to advise on the design of relevant workplace premises prior to and during alterations and construction;
- to liaise and work in partnership with the Health and Safety Executive (HSE), UK Health Security Agency (formally Public Health England) and the Fire Authority regarding the enforcement of the legislation;
- to comply with the HSE'S National Local Authority Enforcement Code in respect of inspection programmes;
- seek to promote a simplified risk assessment procedure for low hazard workplaces such as offices and shops through the use of the Devon Local Authority devised toolkit Safer Workplaces, Better Business and
- to focus on emerging issues such as modern slavery and migrant workers, through liaison with the police and immigration authorities.

6.3.4 Proactive aspects of the health and safety service are often delivered jointly with other proactive services such as food hygiene inspections. For example, a current national enforcement intervention focusses on commercial gas safety – a matter discussed (where relevant) during food hygiene interventions. The reactive aspects of the service,

for example accident investigations, are responded to along with other complaints and requests for service.

- 6.3.5 Health and safety interventions are delivered by suitably trained and experienced officers, in accordance with a competency and development scheme. This scheme has been designed to meet the requirements of Health and Safety Executive and Local Authority Enforcement Liaison Committee (HELA) Section 18 guidance.
- 6.3.6 External consultants may be used to undertake other intervention strategies of low risk premises. The decision to employ contractors is taken by the Service Lead - Environmental Health and Community Safety in consultation with the Principal Environmental Health Officer and will be subject to the following criteria:
- there is a direct need to ensure statutory performance targets are met;
 - external contractors must meet the requirements of HELA Section 18 guidance;
 - the cost of the work can be met within existing budgets; and
 - previous knowledge of the competency and quality of the consultants.
- 6.3.7 The Council still has a duty to enforce health and safety standards in those premises to which it is assigned under the Health and Safety (Enforcing Authority) Regulations 1998 and we will work with such businesses and/or their representatives to improve health and safety standards through the promotion of a Safer Workplace Better Business pack that has been devised by all Local Authorities in Devon.
- 6.3.8 The performance analysis for the last year is detailed at the end of this section. There has been a reduction in proactive inspections, reflecting national priorities regarding better regulation. Equally 2020 onwards saw a significant increase in Covid-related visits to premises, with officers carrying out a large number of spot-checks to ensure that suitable and sufficient risk assessments were in place and safe working methods demonstrated.
- 6.3.9 The health and safety service operates from the Civic Centre between 9.00am and 5.00pm Monday to Friday. Evening and weekend inspections are carried out as determined by the risk based inspection programme and the premises opening hours.
- 6.3.10 Emergency health and safety issues are currently directed initially to a 24-hour central control team and then onto senior officers as required. In addition the Council's continually revised website is used to provide information about health and safety services for consumers and businesses and also provides a direct email address for service requests.

6.4 Complaints / Requests for advice / Advice to Business

- 6.4.1 Additional interventions will also arise during the year by virtue of complaints, new business start-ups, change of use, major alterations/refurbishments and request for inspection. A revisit will always be carried out where statutory notices have been served, in all other cases the officer will make a professional judgement as to the requirement for a revisit.
- 6.4.2 HSE's 2016 strategy *Helping Great Britain Work Well: A health and safety system strategy* sets out six priority themes:
- **Acting together:** Promoting broader ownership of health and safety in Great Britain
 - **Tackling ill health:** Highlighting and tackling the costs of work related ill health
 - **Managing risk well:** Simplifying risk management and helping businesses to grow

- **Supporting small employers:** Giving SMEs simple advice so that they know what they have to do
- **Keeping pace with change:** Anticipating and tackling new health and safety challenges
- **Sharing our success:** Promoting the benefits of Great Britain's world class health and safety system.

6.4.3 The *Statement of Commitment between Local Authority and HSE Regulatory Services* (March 2019) sets out a shared vision for co-regulatory partnership of this strategy.

6.4.4 In addition to these elements the Council will base its Health and Safety Plan on Section 18 guidance, taking into account national, regional and local priorities.

6.4.5 Given the scale of work-related stress (0.8 million people suffering from work-related stress, depression or anxiety (new or long-standing) in 2020/21), we will look at how certain sectors deal with the issue, focussing on our Primary Authority partners and the leisure industry.

6.4.6 From 1 July 2007, all enclosed workplaces became smoke free, as a result of the Health Act 2006 and subsequent regulations. All Environmental Health Officers, Technical Officers, Licensing Officers and Environmental Protection Officers are also authorised to enforce the smoke-free provisions. Smoke free compliance for businesses will be incorporated into the proactive inspection work undertaken by the Environmental Health and Community Safety service, in addition to responding to complaints.

6.4.7 The approach is therefore about focussing health and safety enforcement resources into areas where they are likely to have the greatest impact rather than completing all-encompassing inspections. This will fall in line with the principles advocated the Health and Safety Executive.

6.4.8 The above does not preclude the importance of providing wider guidance on health and safety compliance to new businesses and following specific service requests. Proactive health and safety education work will be suitably balanced against targeted enforcement activity.

6.4.9 The authority has a duty to investigate complaints about health and safety conditions/issues and about its health and safety service provision. A number of complaints/service requests about health and safety are received annually, all of which will be dealt with as appropriate or passed to other agencies.

6.4.10 No complaints have been received regarding the service provision of the Authority.

6.4.11 The service recognises the importance of providing advice to businesses as part of effective health and safety enforcement. As well as the provision of specific advice during interventions and with post intervention correspondence, a wide range of general health, safety and welfare advice is distributed to businesses.

6.4.12 The Council website is also continually revised and allows direct access and links to local and national health and safety information detailed within this service plan.

6.5 Statutory Notifications

6.5.1 Prescribed accidents, dangerous occurrences and occupational diseases are reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. Accidents would include fatalities and accidents involving visits to

hospital or currently more than 7 days off work. Certain accidents involving employees, the self-employed and members of the public are also reportable.

- 6.5.2 The Council has a duty to investigate accidents to determine whether offences have been committed and to prevent a recurrence. The authority also receives notifications of certain unsafe equipment and must respond and investigate such notifications. Decisions as to which accidents require a full investigation are made by the Principal Environmental Health Officer, based on HSE's *Incident Selection Criteria Guidance*.
- 6.5.3 As a 'responsible authority' for the purposes of the Licensing Act 2003 and the Gambling Act 2005 the section has a duty to respond to premises licence applications etc. A number of applications will require scrutiny, some of which may require amendments by negotiation.
- 6.5.4 Liaison with other organisations is essential in order to achieve consistency and effectiveness of the health and safety service. The service is represented on the Devon CEHOs Health and Safety (Enforcement) Sub Group, which meets bi-monthly. This group includes a representative from the Health and Safety Executive (HSE) and maintains links with other local authority health and safety enforcement officers.

6.6 National Priorities

- 6.6.1 HSE's LAC 67/2 (rev.11) - *Setting Local Authority Priorities and Targeting Interventions* includes a number of national priorities, including:
- Raising awareness of the work-related stress and mental health campaign 'Working Minds' with businesses.
 - Ensuring that pubs, restaurants and cafés check that outdoor electrical equipment such as lights and heaters are specifically designed for outdoor use, installed by a competent person and checked regularly for damage or water ingress.
 - The risk associated with work on fragile roofs and skylights.
 - Managing the health risks arising from poor handling of construction materials such as plaster board, paving stones and glazing units.
 - Improving the information provision and supervision of users at trampoline parks.
 - Gas safety in commercial catering premises.
 - Welfare provision for delivery drivers.
 - Work-related road safety for those persons who drive or ride a bike, moped or motorcycle (delivery drivers, for example).
 - Duty to manage asbestos – which will continue to be discussed (where appropriate) during food hygiene interventions.
 - Raising awareness of the need to prevent injury to members of the public from accessing large commercial waste and recycling bins – work which can be carried out as part of our on-going initiative to ensure that commercial waste is being correctly presented.

- Inflatable amusement devices – ensuring adequate ground anchorage, measurement of wind conditions, documentation from a competent inspection body to show compliance with BS EN 14960 and annual inspection by a competent person.

6.6.2 LAC 67/2 (rev.11) also sets out a list of activities/sectors which are suitable for proactive inspection. The current list can be found at Appendix C.

6.7 Monitoring

6.7.1 An annual return is made to the HSE's Local Authority Unit at the end of each financial year. This LAE1 return reports upon the number of proactive inspections, face-to-face contacts, non-inspection interventions and reactive visits carried out over the past year.

6.8 Enforcement

6.8.1 Enforcement (or the fear of enforcement) is an important motivator for rogue employers. Evidence confirms that enforcement is an effective means of securing compliance and promoting self-compliance.

6.8.2 We will work in partnership with the HSE, other enforcement agencies, regulators and stakeholders to secure proportionate compliance with the law and to ensure that those who have duties under it may be held to account for failures to safeguard health and safety and welfare.

6.8.3 The scope of these activities will continue to be evidence-based and are clearly set out in the Council's Enforcement Policy.

6.9 Staff Resources

The national local authority enforcement code requires the Council to have sufficient capacity to undertake our statutory duties. Exeter City Council.

6.9.1 All Environmental Health Officers will undertake some health and safety duties along with their other functions which include food safety, training, health initiatives, some licensing duties and infectious disease control.

6.9.2 The staff resources allocated to the functions is currently deemed adequate to fulfil the Council's duties. Officers will vary their approach to the health and safety intervention programme to enable them to meet Performance Indicators by targeting resources on high-risk premises and national priorities.

6.10 Staff Skills

6.10.1 Only trained and competent staff will be able to undertake full health and safety duties. The authorisation, and hence action they can take, for each officer will reflect their individual skills. As part of the annual Growth and Development Review all staff who undertake health and safety duties are subject to an assessment of competency. Any training and development needs identified at the Growth and Development Review process are added to the service wide training plan which provides for the priority resourcing of both qualification based training and continuing professional development.

6.11 Consultation with Stakeholders

- 6.11.1 The Health and Safety at Work etc. Act 1974 places general duties on all employers to protect the health and safety of their employees and those affected by their work activities. Its goal-setting approach makes clear that those who create risks are best able to manage them. We will make clear that effective health and safety management is a collective responsibility in which individuals too must play their part.
- 6.11.2 Experience shows that many organisations do not contact us. Some may be fearful of contact, which deters them from seeking advice. We will make a special effort to explore new ways to establish and maintain an effective health and safety culture, so that all employers take their responsibilities seriously, the workforce is fully involved and risks are properly managed.
- 6.11.3 We will aim to demonstrate the moral, business and economic case for health and safety. Appropriate health and safety management is an integral part of effective business management and, we will promote it as an enabler and not a hindrance.
- 6.11.4 We will explore ways to promote greater access to authoritative health and safety advice and guidance and we will continue to offer advice in the course of our other enforcement activities where appropriate. We will listen to business's health and safety concerns and assist (by the provision of appropriate guidance, advice, training etc.) as much as is practicable.

7 Sampling Programme

7.1 Purpose of Sampling

- 7.1.1 The food and water quality sampling programme is devised to ensure effective use of resources and fulfil the requirements of the Food Sampling Policy, Private Water Supply Regulations and water quality standards in respect to swimming pools.

7.2 Requirement to Sample

- 7.2.1 The sampling programme operates on a total sampling allocation of 10 samples per 10,000 population. This will require approximately 128 samples per year to be taken. The authority is required to provide a statistical return to the Food Standards Agency (FSA) and Drinking Water Inspectorate on its annual sampling activity. All local authorities have an arrangement with the UK Health Security Agency (formally Public Health England) Laboratory, which provides a credit allocation to facilitate this work.
- 7.2.2 The authority has a duty under the Private Water Supply Regulations to conduct periodic sampling of Private Water supplies within the City. All local authorities within Devon have an arrangement with South West Water, which provides a pay as you sample contract to facilitate this work.
- 7.2.3 The authority also conducts routine swimming pool sampling of all public and private swimming baths within the city. All local authorities have an arrangement with the UK Health Security Agency (formally Public Health England) Laboratory, which provides a credit allocation to facilitate this work.

7.3 Sampling Methodology

- 7.3.1 Primary Authority Partnership role: There is a limited role for the Council to play in this respect as we are without any large national companies producing high-risk products. There are however a few small producers whose products are distributed locally and sampling will provide a means of surveillance of their goods and services.

- 7.3.2 Devon & Cornwall Chief Officers Food Sub Group: The food sub group produce a sampling plan that is applicable to both Unitary and district council members. This sampling plan will act as a 'pick list' and along with nationally agreed surveys will inform the majority of the food sampling methodology. In addition to the national surveys the food sub group have also agreed several local surveys.
- 7.3.3 Vulnerable Foodstuffs: High-risk foodstuffs, which give cause for concern or suspicion, may need to be sampled on an ad hoc basis. This will include sampling verification of controls at a critical step in a food operation and monitoring of imported food from third world countries, for example.
- 7.3.4 Complaints: Food samples may be taken when investigating consumer complaints, either to confirm suspected contamination or in undertaking enquiries resulting from complaints.
- 7.3.5 Statutory Samples: We have a statutory obligation to monitor water distributed by SWWS Ltd and to a limited extent premises with private water supplies.
- 7.3.6 Survey Work: The number of samples taken as a result of Food Alerts, locally/nationally agreed surveys and food poisoning investigations is subject to annual variation, but provision will be made for these items.
- 7.3.7 Environmental Swabs: The swabbing of key food contact and hand contact surfaces is seen as an effective means of contributing to the assessment of hygiene standards during routine food hygiene inspections. Officers will use a combination of swabs sent to the UK Health Security Agency (formally Public Health England) laboratory and ones analysed at the time of visit using an ATP meter (a hand-held device which can produce a numerical representation of the cleanliness of a swabbed surface)

7.4 Budget Provision

- 7.4.1 In addition to the credit allocation provided by the UK Health Security Agency (formally Public Health England) laboratory, sums of £260 (analyst's fees) and £300 (samples) are included within the budget. These sums are intended to cover all sampling and a proportion of this will be reserved for Health and Safety sampling (e.g. asbestos, COSHH etc.).

7.5 Resources

- 7.5.1 There is adequate provision within the present budget to undertake the proposed sampling programme. Allowing for some flexibility between the two budget entries ensures that problems in financing the purchase and analysis of samples for the Food and Health and Safety enforcement functions of the section will be minimised. The programme assumes the current staffing level as outlined in section 5 of this report will be maintained throughout the year.

Year	2022										2023		
Months of sampling	A	M	J	J	A	S	O	N	D	J	F	M	
UK Health Security Agency (formally Public Health England) Studies													
Study 74 – Hygiene in sandwich & salad bars													
Study 75 – Vegan meals/ingredients/meat alternatives													

- 8.4.2 The costs of providing training in other languages significantly increases the costs as the service needs to employ the services of a translator or course tutor who can deliver the course in the desired language to ensure that the courses are equally successful.

9 Resources

9.1 Financial Matters

- 9.1.1 Detailed figures to determine the overall specific level of expenditure involved in providing individual elements of the service are not available as there are fluctuations in priority and need across the wide range of legislative areas. Likewise with changes in the intervention pattern it is difficult to accurately determine the trend of growth, of the various functions of the service. The food safety function can occupy the significant portion of time of the Section, at the expense of the other services.
- 9.1.2 The training element is also covers subjects across the enforcement disciplines, although it has its own budget and cost centre and aims to be cost neutral. External tutors are used to increase efficiency in delivering this service.
- 9.1.3 The budgets for sampling and analysis of samples are currently £560 for the year.

9.2 Budget Allocation Figures for 2022/23 – Food Safety Function

	Salary (+)	Equipment	Travel
<u>Commercial F020</u>	257,570	10,070	790
Proportion allocated to Food Safety Function (40%) Analysis (max) Purchase of Samples	103,028	4028 260 300	316
Environmental Protection Sampling Technician	2,289		

NB: Based on 40% allocation to Food Safety. Analyst fees up to a maximum £260 (may also be used for water/health and safety samples) if required.

9.3 Budget Allocation Figures for 2022/23 – Health and Safety Function

	Salary (+)	Equipment	Travel
<u>Commercial F020</u>	257,570	10,070	790
Proportion allocated to Health & Safety Function (40%)	103,028	4028	316

NB: Based on 40% allocation to Health and Safety. Analyst fees up to a maximum £260 (may also be used for water/health and safety samples) if required.

9.4 17.1.6 Budget Allocation Figures for 2022/23 – Training Provision

	Salary (+)	Equipment	Travel
<u>Health Education F018</u>	5,200	16,140	-

Proportion allocated to Health & Safety function (20%)	1,040	3,228	-
Proportion allocated to Food Safety function (80%)	4,160	12,912	-

9.5 Staffing Allocation

9.5.1 The Environmental Health and Community Safety service is managed by the Environmental Health and Community Safety Service Lead.

Title	Qualification	Role
Service Lead – Environmental Health and Community Safety	BSc / Msc Environmental Health	Head of Service

9.5.2 There are currently 3 FTE staff directly working on food, enforcement and related matters and 2 FTE staff directly working on health and safety related matters with a significant and increasing support role by an Environmental Technical Officer and Project and Support staff.

Title	Qualification	Role
Environmental Health and Community Safety Manager	BSc / Msc Environmental Health	Manager
PEHO	BSc Environmental Health	Lead Professional Officer
EHO	BSc Environmental Health	Food Safety / Health and Safety and Nuisance District Officer
EHO	BSc Environmental Health	Food Safety / Health and Safety and Nuisance District Officer
EHO	BSc Environmental Health	Food Safety / Health and Safety and Nuisance District Officer
EHO (part time)	BSc Environmental Health	Food Safety / Health and Safety Inspector
EHO - Agency	BSc Environmental Health	Food Safety, Health and Safety and Private Water Supplies Contract Inspector
Technical Officer	Educated to 'A' level or equivalent	Sampling and Monitoring

9.5.3 There are currently 3 FTE staff providing a project and support service for The Environmental Health and Community Safety service.

Title	Qualification	Role
Principal Projects and Support Officer	Educated to A level standard	Service Support
Projects and Support Officer	Educated to A level standard	Service Support
Contract Tutors	CIEH/RSPH and/or Highfield Registration	Deliver training courses run by the service

9.5.4 It is currently the approach of the Council to engage the services of outside contractors to assist in programmed food hygiene interventions. This will be subject to any agency contractors meeting the requirements specified in the Code of Practice (England) and the relevant Councils procedure; and the cost of the work being met within existing budgets.

9.6 Self-Development Plan

9.6.1 The service will ensure that staff are appropriately qualified and receive regular training to maintain and improve their level of competency. All officers will have access to at least 20 hours training which will normally be identified at performance appraisal and target setting. For those officers conducting food safety and health and safety enforcement work, a minimum 10 hours food safety and 10 hours of health and safety update training will take place on an annual basis. All Environmental Health staff within the section will be afforded the facility of continuing professional development.

9.6.2 The training structure comprises:

- the employment of enforcement officers capable of food law, health and safety, licensing, environmental permitting and other enforcement that they are required to undertake;
- evidence of formal qualification (sight of original qualification certificates prior to commencement of employment);
- in-house competency-based training;
- successful completion of competence based needs assessments and
- identification of training needs during annual performance appraisal to meet current targets to assist and improve upon performance against current job requirements.

9.6.3 The following additional steps are taken to ensure staff development:

- internal training sessions will be held (anticipated 4 hours CPD in food related topics and 4 hours CPD in health and safety related topics per year);
- briefing notes on topics of current interest will continue to be regularly circulated to bring details of new legislation and technological change in the field of all enforcement areas to the attention of officers and
- programmes of instruction will be devised to accommodate the needs of new and existing staff and ensure the required level of competency.

10 Quality Assessment

10.1.1 The Environmental Health and Community Safety Manager and Principal Environmental Health Officer monitor the quality and consistency of work through the checking of inspection correspondence, statutory notices and audits of various aspects of work conducted on a periodic basis.

10.1.2 Any formal complaints made against the service are investigated and monitored in accordance with Council's Complaint Policy.

10.1.3 External verification of quality is actively pursued with a commitment to promote consistency of enforcement through auditing and benchmarking with the Devon CEHO's Health and Safety, Food Safety and Public Health groups as well the Infection

Control group organised by UK Health Security Agency (formally Public Health England)

- 10.1.4 Internal monitoring procedures have been set up to verify the service operates in conformance with relevant legislation, the Food Law Codes of Practice (England), Section 18 of the Health and Safety at Work etc. Act 1974 and our procedures.
- 10.1.5 The Council will continue to monitor and report on Customer Satisfaction with interventions and enforcement conducted by the service.
- 10.1.6 The Principal Environmental Health Officer undertake annual quality monitoring audit with each inspecting officer to ensure consistency of enforcement. These audits are recorded and any outcomes agreed between the Principal Environmental Health and inspecting officer.

11 Review

- 11.1.1 Quarterly Performance Indicators on progress in implementing this Service Plan will be made by the Service Lead - Environmental Health and Community Safety to the Director.
- 11.1.2 An annual review against the Service Plan will be made by the Executive Committee.
- 11.1.3 The annual review report will contain information on performance against the Service Plan and Performance Indicators. It will highlight any variances from the plan, reasons for these, and the likely impact that these may have.
- 11.1.4 The Executive will support and Council will approve the Service Action Plan for the year. Improvements to the service identified as a result of the review, quality assessment, or benchmarking work will be incorporated in the Plan.
- 11.1.5 Information on our targets and progress towards meeting these will be published and publicised as part of the Council's Performance Plan.

11.2 Targets

- 11.2.1 Service Performance Indicators for 2022/2023:
- Percentage of food premises broadly compliant with food hygiene law (annual figure provided to FSA and APSE as part of annual return)
 - Number of food safety Interventions (annual figure provided to FSA and APSE as part of annual return)
 - Number of health and safety Interventions (annual figure provided to HSE and APSE as part of annual return)
 - Percentage of samples taken found to be satisfactory
 - Number of delegates engaging with health education initiatives (can be provided quarterly or on an annual basis)
 - Percentage staff absence (annual figure provided to APSE as part of annual return)
 - Net cost of food hygiene service per head of the population (annual figure provided to APSE as part of annual return)
 - Net cost of Health and Safety service per head of the population (annual figure provided to APSE as part of annual return)

11.3 Review of performance

- 11.3.1 Performance will be monitored by the Service Lead - Environmental Health and Community Safety and where there are significant issues, reports will be made to the Director.

12 Conclusion

- 12.1.1 This service plan demonstrates that the Council has organised its food safety and health and safety and other associated functions in such a manner that it is capable of achieving a comprehensive service capable of meeting the corporate aims of the authority, and the expectations of the Food Standards Agency, Health and Safety Executive, Drinking Water Inspectorate and other related legislation that the section has responsibility for enforcing.

13 Glossary of terms

GLOSSARY	
CCG	Clinical Commissioning Group
CIEH	Chartered Institute of Environmental Health
DEFRA	Department for Environment, Food and Rural Affairs
EHO	Environmental Health Officer
EHORB	Environmental Health Officers Registration Board
EHT	Environmental Health Technician
FSA	Food Standards Agency
HACCP	Hazard Analysis and Critical Control Points
HECA	Home Energy Conservation Act
HoS	Head of Services
LGR	Local Government Regulation
MHCLG	Ministry of Housing, Communities and Local Government
PEHO	Principal Environmental Health Officer
PHE	UK Health Security Agency (formally Public Health England)
PCT	Primary Care Trust
RIAMS	Regulatory Information and Management Systems
RSPH	Royal Society of Public Health
SWWS	South West Water Services plc

14 Action Plan 2022-23

- 14.1.1 Maintain high standards in food safety by:
- Achievement of the inspection programme outlined in the FSA's Covid Recovery Plan (see 5.3.4 for details).
 - Continuing to maintain high level (>97%) of broadly complaint food businesses in the city.
 - Enhanced coaching/sampling/training for non-complaint businesses, with caution/prosecution as final action for those who continually flout the law.
 - Continuing with an intelligence-led food sampling programme
- 14.1.2 Promote safer workplaces by
- Focussing on the duty to manage asbestos, commercial gas safety and outdoor electrical safety during routine food hygiene inspections whenever appropriate.

- Continuing to provide advice and guidance to business to ensure high Covid-19 standards are being maintained.
- Carrying out an audit of Exeter tattooists to ensure that good standards of health, safety and infection control are maintained
- Continuing to conduct water quality sampling of swimming pools and private water supplies.

14.1.3 Co-ordinate multi-agency visits where migrant worker/modern slavery issues are suspected or identified

14.1.4 Review and refresh the means of business engagement and training using innovative means to help business recover.

14.1.5 To investigate further Primary Authority Partnership opportunities for the service.

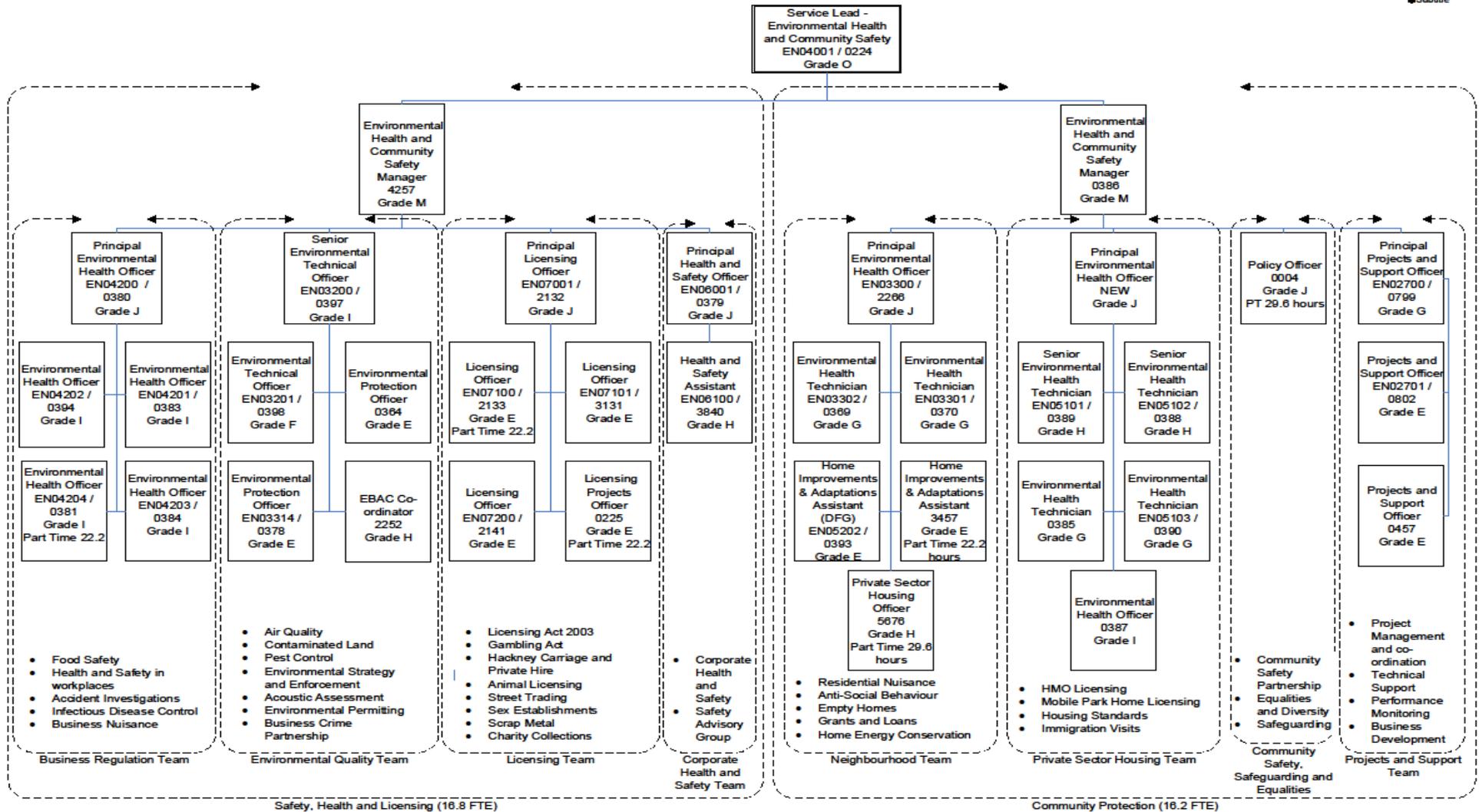
Appendix A – Service Structure

7/28/2020

Structure of Environmental Health and Community Safety – 34 FTE

Subtitle

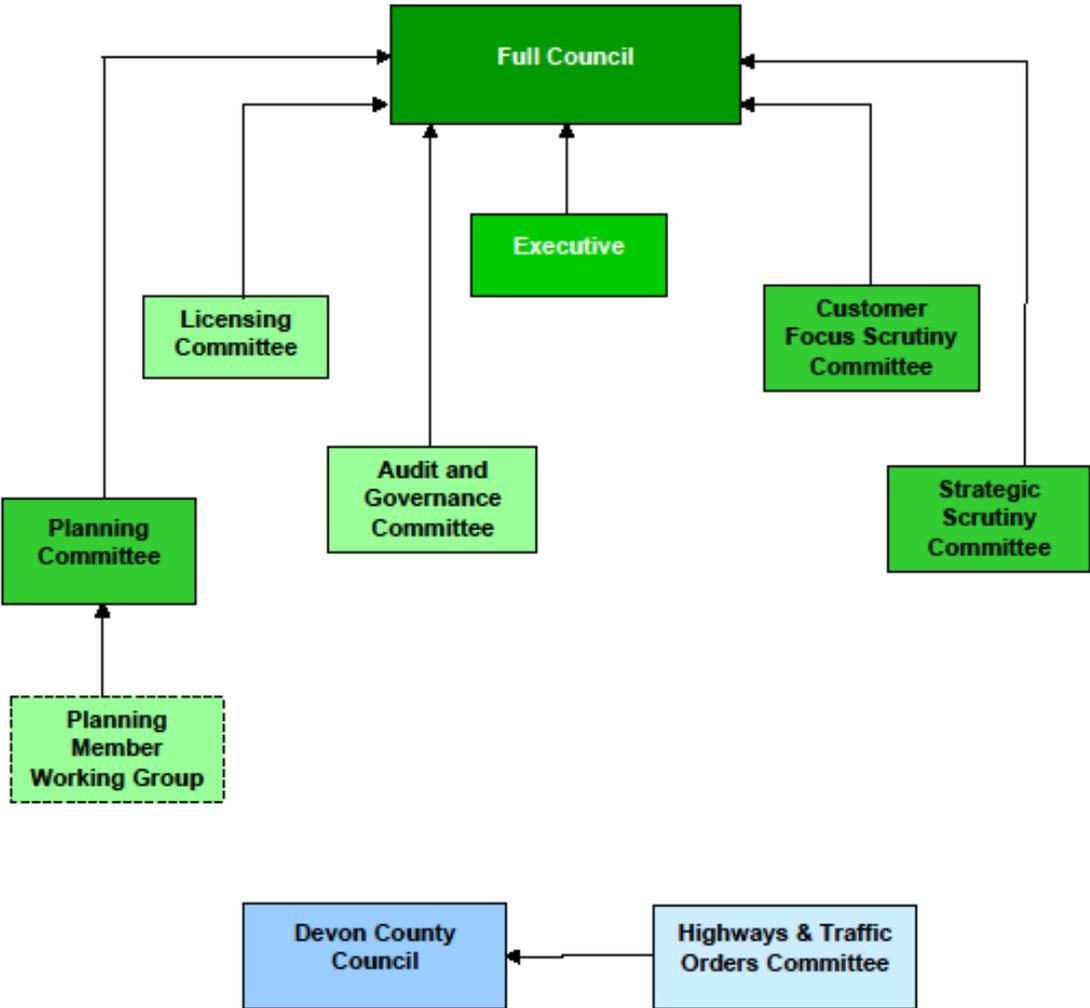
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Appendix B – Committee Structure



The Council's Committee Structure



Appendix C – List of activities / sectors for proactive inspection by Local Authorities

No	Hazards	High Risk Sectors	High Risk Activities
1	Explosion caused by leaking LPG	Community/amenity buildings on caravan/camping parks with buried metal LPG pipework	Caravan/camping parks with poor infrastructure risk control/management of maintenance
2	E.coli/Cryptosporidium infection esp. in children	Open Farms/Animal Visitor Attractions	Lack of suitable micro-organism control measures
3	Fatalities/injuries resulting from being struck by vehicles	High volume Warehousing/Distribution	Poorly managed workplace transport
4	Fatalities/injuries resulting from falls from height/ amputation and crushing injuries.	Industrial retail/wholesale premises	Poorly managed workplace transport/work at height/cutting machinery /lifting equipment.
5	Occupational deafness	Industrial retail/wholesale premises	Exposure to excessive noise (e.g. steel stockholders)
6	Industrial diseases (occupational deafness/ occupational lung disease – silicosis)	Industrial retail/wholesale premises	Exposure to excessive noise (steel stockholders),), Exposure to respirable crystalline silica (retail outlets cutting/shaping their own stone or high silica content 'manufactured stone' e.g. gravestones or kitchen resin/stone worktops)
7	Occupational lung disease (cancer)	Industrial retail/wholesale premises	Exposure to all welding fume regardless of type or duration may cause cancer. (e.g. Hot cutting work in steel stockholders) Exposure to be controlled with LEV and or appropriate RPE.
8	Occupational lung disease (asthma)	In-store bakeries and retail craft bakeries where loose flour is used and inhalation exposure to flour dust is likely to frequently occur i.e. not baking pre-made products.	Tasks where inhalation exposure to flour dust and/or associated enzymes may occur e.g. tipping ingredients into mixers, bag disposal, weighing and dispensing, mixing, dusting with flour by hand or using a sieve, using flour on dough brakes and roll machines, maintenance activities or workplace cleaning.
9	Musculoskeletal Disorders (MSDs)	Residential care	Lack of effective management of MSD risks

			arising from moving and handling of persons
10	Falls from height	High volume Warehousing/Distribution	Work at height
11	Manual Handling	High volume warehousing/distribution	Lack of effective management of manual handling risks
12	Crowd control & injuries/fatalities to the public	Large scale public gatherings e.g. cultural events, sports, festivals & live music	Lack of suitable planning, management and monitoring of the risks arising from crowd movement and behaviour as they arrive, leave and move around a venue.
13	Carbon monoxide poisoning and gas explosion	Commercial catering premises using solid fuel cooking equipment	Lack of suitable ventilation and/or unsafe appliances.
14	Violence at work	Premises with vulnerable working conditions (lone/night working/cash handling e.g. betting shops/off licences/hospitality) and where intelligence indicates that risks are not being effectively managed.	Lack of suitable security measures/procedures. Operating where police/licensing authorities advise there are local factors increasing the risk of violence at work e.g. located in a high crime area, or similar local establishments have been recently targeted as part of a criminal campaign.
15	Fires and explosions caused by the initiation of explosives, including fireworks	Professional Firework Display Operators	Poorly managed fusing of fireworks

Equality Impact Assessment: Food Law and Health and Safety Enforcement Service Plan

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name & date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Executive 6 September 2022 Council 18 October 2022	Food Law and Health and Safety Service Plan	Adoption of service plan	The Service Plan forms the basis of the business regulation enforcement functions for the authority and ensures that national food safety and health and safety priorities are addressed along with locally identified needs. It demonstrates our commitment to improving public safety and health outcomes, sets out our priorities and planned interventions for the current year and targets them to maximise their impact.

			<p>Exeter City Council has a duty to act as an enforcing authority in premises for which it is responsible. The plan outlines how the Council will undertake that function.</p> <p>It has been produced to ensure that local businesses, landlords, employers and employees, members of the public, council officers and Members understand the approach to regulatory enforcement adopted by the Council. The service plan will help to ensure that the actions of the Council are fair, consistent, open and effective.</p> <p>The Council recognises the important role it plays promoting and securing the safety and health of those who live, work and visit the City. The key aim of this plan is to demonstrate how the Council will fulfil its statutory obligations in accordance with national guidance set out by the respective regulatory agencies. It includes:</p> <ul style="list-style-type: none"> • the Council's aim and objectives; • information about the enforcement services provided by the Council; • details of the Council's performance management systems; • information on performance
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Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This is must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact –some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
<p>Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).</p>	<p>Neutral</p>		<p>There is no evidence that this will impact on any specific person based on this characteristic. Any incidental impact on those within this group is very likely to be positive – for example – promotion of the Food Standard Agency’s guidance for Chinese and Indian cuisines where appropriate.</p> <p>During our routine inspections, we will look for evidence of modern slavery and share this information with partner agencies such as the police. In these situations, unsafe working conditions or inadequate accommodation will be remedied using our enforcement powers as appropriate.</p>
<p>Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.</p>	<p>Positive</p>		<p>The Service Plan applies equally to all residents of Exeter irrespective of disability.</p> <p>Our service does seek to positively support those with disabilities through ensuring safe workplaces.</p> <p>Our food hygiene training courses are available as e-learning, which allow delegates to progress at their own pace and at any location; for our taught courses we offer an oral examination for persons unable to complete a written paper.</p> <p>Food businesses serving predominantly immuno-compromised persons (such as some care homes and hospital kitchens) are inspected at a more frequent interval.</p> <p>Some allergies can be persistent and life threatening; our inspections of food businesses include an assessment of allergen management and communication, with appropriate enforcement where necessary.</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			Safer workplaces are of particular importance to people with long-term health conditions – for example, our enforcement of smoke free legislation and the health and safety law pertaining to legionella and asbestos has a positive impact on persons with chronic lung disease.
Sex/Gender	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Gender reassignment	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Positive		<p>We work with the beauty industry to ensure that persons under the age of 18 do not use sunbeds or acquire a tattoo. We promote, when registering skin piercers, a policy of not piercing those under 16 without a parent/guardian present.</p> <p>Businesses serving food predominantly to vulnerable groups (including those under the age of 5 or over the age of 65) are inspected more frequently (typically annually) than other catering premises.</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Pregnancy and maternity including new and breast feeding mothers	Neutral		There is no evidence that this will impact on any specific person based on this characteristic. We offer advice and guidance to employers on the health and safety requirements for new and expectant mothers at work.
Marriage and civil partnership status	Neutral		There is no evidence that this will impact on any specific person based on this characteristic.

Actions identified that will mitigate any negative impacts and/or promote inclusion

The Council will consider Equalities and protected characteristics at all stages of any intervention.

All Authorised Officers will ensure that all persons dealt with receive fair and equitable treatment irrespective of their background or protected characteristics, as defined by the Equality Act 2010.

Officer: Simon Ruddy, Principal Environmental Health Officer

Date: August 2022

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REPORT TO EXECUTIVE

Date of Meeting: 6 September 2022

REPORT TO COUNCIL

Date of Meeting: 18 October 2022

Report of: Director – Net Zero and City Management

Title: Air Quality Annual Status Report

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 To present the statutory Annual Status report that has been submitted to the Department of Environment, Food and Rural Affairs (DEFRA). This contains the monitoring data from 2021 and a summary of the actions taken in that year to improve local air quality.

2. Recommendations:

2.1 That Executive Committee notes the statutory annual status report, and RECOMMENDS that Council notes the statutory annual status report.

3. Reasons for the recommendation:

3.1 Action on local air quality is a legal duty placed upon the Council (and all district and county councils) by Part IV of the Environment Act 1995. Safeguarding air quality will help reduce any detrimental effects from air pollution on the health and wellbeing of Exeter's population. We are required under this legislation to submit an Annual Status Report to DEFRA using their template and to present the report to members at a local level.

4. What are the resource implications including non financial resources?

4.1 The City Council will continue to monitor air pollution and report on levels. This will take place within existing resources.

5. Section 151 Officer comments:

There are no financial implications for Council to consider.

6. What are the legal aspects?

6.1 Part IV of the Environment Act 1995 sets out statutory provisions on air quality. Section 82 provides that local authorities shall review the air quality within their area. Section 83 requires local authorities to designate Air Quality Management Areas

(AQMAs) where air quality objectives are not being achieved, or are not likely to be achieved (i.e. where pollution levels exceed the air quality objectives) as set out in the Air Quality (England) Regulations 2000. Where an area has been designated as an AQMA, Section 84 requires local authorities to develop an Air Quality Action Plan (AQAP) setting out the remedial measures required to achieve the air quality standards for the area covered within the AQMA.

6.2 The Department for Environment, Food and Rural Affairs (DEFRA) has provided statutory guidance in the form of the Local Air Quality Management Policy Guidance (PG16). The guidance gives particular focus to so-called 'priority pollutants' such as Nitrogen Dioxide (NO₂) and so-called 'Particulate Matter' (PM₁₀ and PM_{2.5}) which are relevant to both district and county councils. Local Authorities are required to submit an Annual Status Report (ASR) to the Department for Environment, Food and Rural Affairs in order to report the progress being made in achieving reductions in concentrations of emissions relating to relevant pollutants below air quality objective levels. The completed report is submitted to the Secretary of State (DEFRA) for consideration. DEFRA provide comments back to the Local Authority which the Authority must 'have regard to'.

7. Monitoring Officer's comments:

It is a legal requirement for the Council to produce this Air Quality Annual Status report. Its contents do not raise any issues for the Monitoring Officer.

John Street (Deputy Monitoring Officer)

8. Report details:

8.1 There are two national objectives for levels of nitrogen dioxide. These are for the average level over a whole year, which should be below 40 µg/m³, and the average level for one hour, which should not exceed 200 µg/m³ on more than 18 occasions during a year. Local authorities are told that this one hour standard is unlikely to be exceeded where the average level over a whole year is below 60 µg/m³ so this measurement is a commonly used proxy. The annual average objective applies to residential, hospital and education sites. The hourly average objective applies to these sites and to busy streets and workplaces as well.

8.2 Exeter City Council has a monitoring network that is designed to identify the areas with the highest levels of nitrogen dioxide, at the locations where the objectives apply. Most of the monitoring sites are therefore on residential properties in close proximity to the busiest roads and junctions in the city. The results of the monitoring conducted by the City Council is not representative of typical or average conditions across the city. Instead most of the monitoring sites are indicative of the worst case locations.

8.3 The number of sites which exceed the objective has reduced significantly since the AQMA was declared (a reduction from 32 exceedances in 2009 to one in 2021). The highest levels are measured on the Heavitree corridor, at East Wonford Hill. Here levels have previously been close to or above the levels which indicates an exceedance of the hourly objective but in 2021 were significantly lower at 42.2 µg/m³.

8.4 The measured results can be found in table A.3 of the Annual Status Report (appendix 1). Trends in annual nitrogen dioxide concentrations can also be seen in Figure

A.1. These show that in 2020 levels of nitrogen dioxide at every site, including East Wonford Hill fell to below the objective levels. This significant fall was caused by a reduction in traffic flows as a result of COVID-19. There was a rebound in 2021, but not back to pre-pandemic levels.

8.5 This pattern is matched by traffic flows, which fell dramatically in 2020 and rebounded only partially in 2021. It is too early to say whether traffic flows will return to pre-pandemic levels and if they do whether this will be matched by a full return in air pollution levels as well. At the same time as the changes caused by Covid, there will also have been changes in the vehicle fleet which should have reduced emissions from newer vehicles. These factors will be evaluated in future reports, looking at the data from 2022 and beyond.

8.6 Some sites have levels between 35 and 40 $\mu\text{g}/\text{m}^3$ (i.e. are close to but not above the objective level of 40). In 2020 this was the case at Alphington Street, Salutory Mount and Honiton Road, with all other sites having levels below 35. Most locations along the busy routes into and around the city had concentrations of nitrogen dioxide in the range between 25 and 35 $\mu\text{g}/\text{m}^3$ during last year.

8.7 As you move away from busy roads, levels in previous years have fallen below 25 $\mu\text{g}/\text{m}^3$. In 2021, levels in these areas were typically between 10 and 15 $\mu\text{g}/\text{m}^3$ for purely suburban streets and between 15 and 20 $\mu\text{g}/\text{m}^3$ for local through routes. The majority of the population of Exeter therefore live in locations with concentrations of nitrogen dioxide well below the objective, but a small number are exposed at home to levels above the objective. No schools in Exeter experience levels above the objective.

8.8 NO_2 levels in Exeter have at most sites fallen since a peak in 2009 then were broadly stable in the four years prior to 2020. 2020 was exceptional, in terms of the reduction in traffic flows during some parts of the year and it remains to be seen how representative 2021 is of the situation going forward. Trends in air quality generally take several years to emerge even in normal times, because of the annual variability caused by weather. What the long term impact of COVID-19 will be on air quality is uncertain. As trends do appear, any necessary changes to the AQMA orders or Air Quality Action Plan (AQAP) will be reported in future Annual Status Reports.

8.9 The Annual Status Report also summarises the results of particulate pollution measurements (PM_{10} and $\text{PM}_{2.5}$). No areas in the city are thought to exceed the objectives for this type of air pollution. It should also be noted that local authorities do not have legal duties to achieve the objectives for $\text{PM}_{2.5}$. This responsibility sits with national government in recognition of the fact that the sources of this type of pollution are much less local and may therefore be mainly beyond the local control. It is also worth noting that PM_{10} concentrations have shown a steady decline since 2006.

8.10 The annual status report also summarises the measures that the City Council has taken in the last year to reduce pollution levels, and the actions that will be implemented in the coming year (table 2.2 of the Annual Status Report). Work in this area is also being co-ordinated with Exeter City Futures and the Sport England Local Development Pilot.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 Successful implementation of the Air Quality Action Plan will contribute towards all of the Council's Strategic programmes (promoting active and healthy lifestyles, building great neighbourhoods and net zero). The collection of reliable air quality data is a vital part of this process, so that the Council and others can understand the scale, location and trends in pollution objective exceedences.

10. What risks are there and how can they be reduced?

10.1 This report is for the information of the Committee only and there are no risks associated with the recommendation to note the contents of the Annual Status Report. There are risks in the implementation of the Air Quality Action Plan, such as funding. This is acknowledged within the Annual Status Report. Any necessary alterations to the Action Plan can be made by means of future Annual Status Reports.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because the report is for information only. An equalities assessment was conducted as part of the production of the Air Quality Action Plan.

12. Carbon Footprint (Environmental) Implications:

12.1 Measures to improve local air quality will also reduce carbon emissions from transport (although the opposite is not always true). The recommendations of this report therefore align with and support the Council's carbon reduction target (carbon neutral by 2030).

13. Are there any other options?

13.1 Completing an Annual Status Report and submitting it to DEFRA is a legal duty.

Director Net Zero and City Management, David Bartram

Author: Simon Lane, Service Lead – Environmental Health and Community Safety

Alex Bulleid, Senior Environmental Technical Officer

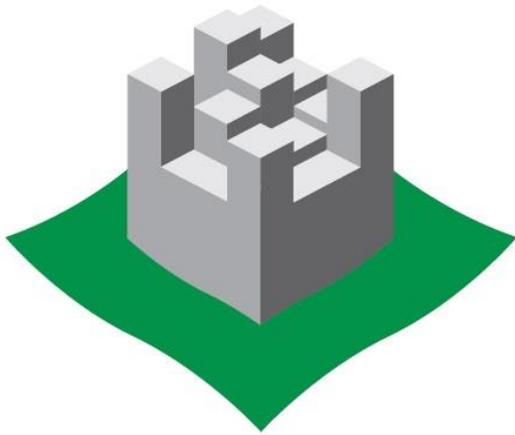
Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

Contact for enquires:
Democratic Services (Committees)
Room 4.36
01392 265275

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Exeter
City Council

2022 Air Quality Annual Status Report (ASR)

In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management

Date: June, 2022

Information	Exeter City Council Details
Local Authority Officer	Alex Bulleid and Jonathan Knight
Department	Environmental Health & Community Safety
Address	Civic Centre, Paris Street, Exeter, EX1 1 RQ
Telephone	01392 265147
E-mail	Environmental.Health@exeter.gov.uk
Report Reference Number	ASR 2021
Date	June 2022

Executive Summary: Air Quality in Our Area

Air Quality in Exeter

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent areas^{1,2}.

The mortality burden of air pollution within the UK is equivalent to 28,000 to 36,000 deaths at typical ages³, with a total estimated healthcare cost to the NHS and social care of £157 million in 2017⁴.

Public Health England's Public Health Outcomes Framework tool shows that in Exeter in 2020 the fraction of mortality attributable to particulate air pollution was 5.2%. This is equal to the regional figure for the south west (5.2%) and below the national level of 5.6%.

Exeter therefore has levels of particulate matter which are causing harm, but this problem is less severe than in over half the country. The data is available at [this link](#).

Exeter City Council has a monitoring network that is designed to identify the areas with the highest levels of nitrogen dioxide, at the locations where the objectives apply. Most of the monitoring sites are therefore on residential properties in close proximity to the busiest roads and junctions in the city. The results of the monitoring conducted by the City Council is not generally representative of typical or average conditions across the city. Instead it is indicative of the worst case locations.

¹ Public Health England. Air Quality: A Briefing for Directors of Public Health, 2017

² Defra. Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006

³ Defra. Air quality appraisal: damage cost guidance, July 2021

⁴ Public Health England. Estimation of costs to the NHS and social care due to the health impacts of air pollution: summary report, May 2018

Prior to 2020 the annual average objective was regularly exceeded at a number of places in the city. These were at Alphington Street and along the Heavitree corridor into the city. The highest levels measured have typically been on the Heavitree corridor, at East Wonford Hill. Here levels historically were close to or above the level which indicates an exceedance of the hourly objective.

The measured results for 2021 can be found in Table A.3 of this report. Trends in annual nitrogen dioxide concentrations can also be seen in Figure A.1. These show that in 2021 levels of nitrogen dioxide were below the objective at every site except East Wonford Hill. The significant fall seen in 2020 as a result of a reduction in traffic flows during COVID-19 has rebounded in 2021 but not back to pre-pandemic levels. This is likely to be caused by a combination of traffic flows still being slightly below those seen before Covid but also the ongoing improvement in vehicle emissions technologies.

Some sites have levels between 35 and 40 $\mu\text{g}/\text{m}^3$ (i.e. close to but not above the objective level of 40). In 2021 this was the case at Alphington Street, Salutory Mount and Honiton Road, with all other sites having levels below 35. Most locations along the busy routes into and around the city had concentrations of nitrogen dioxide in the range between 25 and 35 $\mu\text{g}/\text{m}^3$ during last year.

As you move away from busy roads, levels fall below 25 $\mu\text{g}/\text{m}^3$. In 2021, levels in these areas were typically between 10 and 15 $\mu\text{g}/\text{m}^3$ for purely suburban streets and between 15 and 20 $\mu\text{g}/\text{m}^3$ for local through routes. The majority of the population of Exeter therefore live in locations with concentrations of nitrogen dioxide well below the objective, but a small number are still exposed at home to levels above the objective. No schools in Exeter experience levels above the objective.

The data shows that no locations measured an exceedance of the proxy for the hourly nitrogen dioxide objective in 2021 (an annual average of 60 $\mu\text{g}/\text{m}^3$).

2020 was exceptional, in terms of the change in traffic flows, so the Council had no plans to amend the AQMA as a result of the changes to NO₂ concentrations seen in that year. The last Annual Status Report (published in 2021) recommended that longer term trends were monitored to confirm which exceedances have indeed been permanently resolved. There will also always be natural variation between years as a result of local small changes in traffic flows (road works etc) and weather patterns which makes identifying any trend difficult over short periods of time even where other factors are stable.

Given that traffic flows did not fully return in 2021 to pre-pandemic levels (Table 15.1) it is again recommended that the AQMA order and boundary remain unchanged for now. It seems highly likely that previous exceedences at locations such as the Blackboy Road / Pinhoe Road junction (DT42 and DT43) have been permanently resolved given that they had fallen below $40 \mu\text{g}/\text{m}^3$ in 2018 and there have therefore been below the objective for 4 years. However the Council does not intend to review the AQMA order or AQMA boundary until 2024 when the current AQAP terminates. Before this date action to improve air quality will continue to be focussed on those areas within the AQMA where exceedences have been measured recently (East Wonford Hill). A complete review will commence in 2024 together with the necessary reports and consultation for an amended AQMA (if required) and subsequently a new AQAP.

The Annual Status Report also summarises the results of particulate pollution measurements (PM_{10} and $\text{PM}_{2.5}$). No areas in the city are thought to exceed the objectives for this type of air pollution. Measured $\text{PM}_{2.5}$ concentrations were well below the relevant objective level and PM_{10} concentrations have shown a steady decline since 2006.

The current AQAP covers the period 2019-2024. It was published following a significant consultation and engagement process which reached nearly 3000 people. The plan is available online at [this link](#). Exeter City Council will work with Devon County Council Highways team, neighbouring authorities, Exeter City Futures and Sport England to deliver the measures in this plan.

Actions to Improve Air Quality

Whilst air quality has improved significantly in recent decades, and will continue to improve due to national policy decisions, there are some areas where local action is needed to improve air quality further.

The 2019 Clean Air Strategy⁵ sets out the case for action, with goals to reduce exposure to harmful pollutants. The Road to Zero⁶ sets out the approach to reduce exhaust emissions from road transport through a number of mechanisms; this is extremely

⁵ Defra. Clean Air Strategy, 2019

⁶ DfT. The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy, July 2018

important given that the majority of Air Quality Management Areas (AQMAs) are designated due to elevated concentrations heavily influenced by transport emissions.

Exeter City Council has taken forward a number of direct measures during the current reporting year of 2021 in pursuit of improving local air quality. Further details are provided later in the report but key completed measures include:

1. Implementation of the Physical Activity Strategy. The strategy focusses on getting the least active members of the community moving more (including active travel) with a key focus being to normalise and increase active travel in everyday life.
2. An options appraisal has been prepared to consult in 2022 with the Newtown community on public realm improvements, parklets and highway interventions which will enable and encourage more people to use active travel modes within the local area.
3. The Sport England Local Delivery Pilot team has developed and tested the governance and application structure for communities to be able to implement localised, regular closures of roads within their neighbourhoods. For specific periods this will provide sections of roads where the priority will be given to activity (play) rather than travel.
4. Work has continued at Water Lane, where the Council is building a large solar array with battery storage which will power a fleet of electric refuse collection vehicles (to be delivered in 2022).
5. Scrutiny of planning applications for air quality impacts, including making objections to developments on air quality grounds where this is justified and the negotiation of mitigation in accordance with Council and national planning policy.
6. From 1st Jan 2020 adopted policy required the Hackney carriage fleet to be 50% Euro 6 wheelchair accessible vehicles and 50% ULEV saloon cars with a stated emission level of 75g km CO₂ or below. This policy continues to be implemented.
7. A reduction in NO_x emissions from buildings as a result of a variety of measures intended primarily to address fuel poverty and carbon emissions.
8. The new bus station was opened, which provides improved facilities for public transport users in the city.
9. The City Council is partners with Devon County Council and Co Delivery in a scheme which secured £80,000 of grant funding from the Department for Transport

Energy Saving Trust to expand the capabilities of e-cargo bikes for business travel. Nine electric cargo bikes have been secured for use within the partner organisations, Devon County Council, Exeter City Council, University of Exeter and Royal Devon & Exeter NHS Foundation Trust (RD&E).

10. Devon County Council published a new Transport Strategy in 2020 with three themes: Greater Connectivity, Greater Places for People and Greater Innovation. Devon County Council are now working through implementation plans for this and working closely with Exeter City Council to link with the Liveable Exeter sites and vision.

Key targets within the strategy include:

- 50% of trips by foot or cycle within the city;
- Removal of air quality exceedances in the city.

11. Work has continued on a draft Exeter Local Cycling and Walking Infrastructure Plan.
12. Pop up measures to facilitate social distancing and active travel were introduced in 2020. The changes include the introduction of a new 5km cross city route (E9 Newcourt/Pynes Hill to City centre), supplemented with new crossings (eg at Russell Way). Some of these pop-up measures have been made permanent in 2021, such as the road closures and modal filters on Ludwell Lane, Dryden Road and Wonford Road. Work to make the Magdalen Street section permanent was ongoing during 2021.
13. Permanent school streets introduced at Whipton Barton School and Ladysmith School.
14. Filtered permeability plans for the whole Heavitree area are still under development although some elements have been delivered already, including the modal filter on Homefield Road and contra-flow cycle lane on Park Place.
15. Work was completed on a new Park and Change site at the Science Park and the site has been opened.
16. Work continues on a new station at Marsh Barton.
17. Work commenced to re-open the Okehampton railway line to daily services. This will provide a valuable alternative to car travel for people coming into the city from the area north of Dartmoor and increased service frequency from Crediton.

18. The local Co-Cars car club now includes 27 locations including 36 cars and one van (23 of which are electric). Car Clubs are expected to expand further in 2022 with more electric car clubs as part of the Rapid Charging Exeter project.
19. Continued expansion of Co-Bikes (the local on-street e-cycle hire scheme) to now include 26 hire and docking locations.
20. Further development of the cycle network in and around the city, particularly plans for route E4 where detailed designs are being worked up for the Stoke Hill roundabout and Union Road section.
21. New cycle parking provision in the city's parks and open spaces (funded by DCC).
22. DCC restarted their Travel Planning service provided to new residential developments.
23. Bus patronage recovered to some extent from the effect of Covid 19 lockdowns. Total patronage on Devon's bus network in 2018/19 (the last year for which data is unaffected by the pandemic) was approximately 23.7 million passenger journeys. There was already a downward trend prior to Covid because this was a 10% reduction on the 2011/12 figure of 26.3 million. In 2019/20 patronage reduced slightly to 23.3 million, partially due to the national lockdown in March 2020, but 2020/21 figures were most markedly impacted, with total patronage falling to just 8.1 million. Figures improved slightly in 21/22 but whole year figures were below what would otherwise have been expected. Figures for 21/22 were just below 15 million (previous predictions cited this at 16.5 million).
24. Tour of Britain. A stage of the race finished in Exeter with successful events being run alongside to inspire the next generations of cyclists and also encourage greater participation within the sport.
25. Supporting Ride-On cycling to deliver 25 days of free public Dr-Bike sessions in the City Centre, enabling members of the public to get a bike maintenance check and therefore ride it more frequently.
26. Delivering 5 Cycle Celebration events across the city (and Cranbrook) which engaged with 600-750 people. These events enable members of the community to try cycling, to re-engage with cycling or to just meet up with other people around the shared aspect of community activity. The longer-term output of these events will be to inspire the community to take up cycling or perhaps return to cycling.

Exeter City Council expects the following measures to be completed over the course of the next reporting year:

- Further refinement of the net zero plan for Exeter, in conjunction with Exeter City Futures.
- Implementation of the Transport Strategy by DCC, in conjunction with the Active and Healthy People Programme team.
- Devon County Council's residential travel planning services to be integrated with the Sport England Local Delivery Pilot work.
- An Exeter Local Cycling and Walking Infrastructure Plan is being developed for publication in 22/23 (to be incorporated into the Exeter Plan and future Devon Local Transport Plan).
- Sport England Project work will continue; including on the Wonford Health and Wellbeing Centre, Newtown active neighbourhood, enabling road closures for play streets and community events, community builders and social prescribing.
- Work to enable the delivery of a Water Lane low traffic neighbourhood through redevelopment of brownfield land.
- Three electric bin lorries will be delivered in summer 2022.
- All new vehicles entering the Council's fleet are likely to be electric (unless operational requirements make this impossible).
- Education projects such as Junior Life Skills will re-start after Covid-19.
- 10 new Co-Cars sites are planned.
- A decision will be made on an experimental traffic order for the Heavitree area filtered permeability project.
- Marsh Barton station to be opened.
- The Okehampton railway line will operate an hourly service in 2022 and feasibility work will commence on a possible future Okehampton Parkway station.
- Further improvements will take place to the E4 cycle route linking the new development areas at Monkerton, Tithebarn and Cranbrook with the University. This will make it safer and easier to make journeys by bike.
- The highway changes to make Magdalen Road one way and widen the cycle route will be made permanent.

- £14m of funding (over 3yrs) has been received by Devon County Council for its Bus Service Improvement Plan across the County.

Conclusions and Priorities

Nitrogen dioxide levels in Exeter in 2021 were slightly above those measured in 2020 but still show a noticeable reduction on pre-pandemic levels such that only one location was above the objective (East Wonford Hill). Trends will be monitored over the coming years to identify whether the area of exceedance remains small or whether further post-Covid rebound in traffic might cause an increase in levels during 2022. Exeter City Council does not intend to review the AQMA order or AQMA boundary until 2024 when the current AQAP terminates. Before this date action to improve air quality will continue to be focussed on those areas within the AQMA where exceedances have been measured recently. A complete review will commence in 2024 together with the necessary reports and consultation for an amended AQMA (if required) and subsequently a new AQAP.

No areas in the city are thought to exceed the objectives for particulate air pollution. Measured PM_{2.5} concentrations were well below the relevant objective level and PM₁₀ concentrations have shown a steady decline since 2006.

The priorities and challenges for 2022 are to implement the Physical Activity Strategy and Transport Strategy, to deliver the Local Cycling and Walking Implementation Plan and to deliver robust planning policy; all in the face of challenging and uncertain conditions.

Local Engagement and How to get Involved

Local air pollution currently has a high profile within the city. For example it is one of Exeter City Futures' 12 goals, nearly 3000 people were involved in the consultation on the current AQAP and Devon County Council have committed in their Transportation Strategy to resolve exceedances of the objective.

Exeter City Futures welcomes proposals from community and interest groups who wish to improve air quality in their local area. The Wellbeing Exeter Community Builders are actively engaging with local communities to increase active travel, social inclusion, improve the public realm for walking and cycling and to benefit air quality.

Exeter City Council

Further enquiries about pollution levels and actions to improve air quality should be made to environmental.protection@exeter.gov.uk.

Local Responsibilities and Commitment

This ASR was prepared by the Environmental Health Department of Exeter City Council with the support and agreement of the following officers and departments:

Exeter City Council - City Development

Exeter City Council – Active and Healthy People Programme

Devon County Council - Highways

This ASR has been approved by:

Service Lead (Environmental Health & Community Safety). Once the report has been checked by DEFRA it will be presented to members at committee.

This ASR has been signed off by a Director of Public Health.

If you have any comments on this ASR please send them for the attention of Alex Bulleid and Jonathan Knight at:

Exeter City Council

Environmental Health and Community Safety

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1 Local Air Quality Management

This report provides an overview of air quality in Exeter during 2021. It fulfils the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995) and the relevant Policy and Technical Guidance documents.

The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the air quality objectives are likely to be achieved. Where an exceedance is considered likely the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of the objectives. This Annual Status Report (ASR) is an annual requirement showing the strategies employed by Exeter City Council and partners to improve air quality and any progress that has been made.

The statutory air quality objectives applicable to LAQM in England are presented in Table E.1.

2 Actions to Improve Air Quality

2.1 Air Quality Management Areas

Air Quality Management Areas (AQMAs) are declared when there is an exceedance or likely exceedance of an air quality objective. After declaration, the authority should prepare an Air Quality Action Plan (AQAP) within 12 months setting out measures it intends to put in place in pursuit of compliance with the objectives.

A summary of AQMAs declared by Exeter City Council can be found in Table 2.1. The table presents a description of the one AQMA that is currently designated within Exeter. Appendix D: Map(s) of Monitoring Locations and AQMAs provides maps of the AQMA and also the air quality monitoring locations in relation to the AQMA. The air quality objectives pertinent to the current AQMA designation are as follows:

- NO₂ annual mean;
- NO₂ hourly mean.

Table 2.1 – Declared Air Quality Management Areas

AQMA Name	Date of Declaration	Pollutants and Air Quality Objectives	One Line Description	Is air quality in the AQMA influenced by roads controlled by National Highways?	Level of Exceedance: Declaration	Level of Exceedance: Current Year	Name and Date of AQAP Publication	Web Link to AQAP
Exeter AQMA	Declared 2007, Amended 2011	NO2 Annual Mean	An area encompassing the radial routes into the city and other major routes	NO	70 µg/m3	42.2 µg/m3	Exeter AQAP 2019-2024	www.exeter.gov.uk/airpollution
Exeter AQMA	Declared 2007, Amended 2010	NO2 1 Hour Mean	An area encompassing the radial routes into the city and other major routes	NO	65 µg/m3	N/A	Exeter AQAP 2019-2024	www.exeter.gov.uk/airpollution

Exeter City Council confirm the information on UK-Air regarding their AQMA(s) is up to date.

Exeter City Council confirm that all current AQAPs have been submitted to Defra.

2.2 Progress and Impact of Measures to address Air Quality in Exeter

Defra's appraisal of last year's ASR concluded that "Overall, the report is detailed, concise and satisfies the criteria of relevant standards. The Council should maintain their good and thorough work."

Exeter City Council has taken forward a number of direct measures during the current reporting year of 2021 in pursuit of improving local air quality. Details of all measures completed, in progress or planned are set out in Table 2.2. Seventeen measures are included within Table 2.2, with the type of measure and the progress Exeter City Council has made during the reporting year of 2021 presented. Where there have been, or continue to be, barriers restricting the implementation of the measure, these are also presented within Table 2.2.

More detail on these measures can be found in the Air Quality Action Plan, Physical Activity Strategy and Transportation Strategy. Key completed measures are:

1. Exeter City Council has started to implement its Physical Activity Strategy. The strategy focusses on getting the least active members of the community moving more (including active travel) with a key focus being to normalise and increase active travel in everyday life. It also prioritises development projects for the Wonford Health & Wellbeing Centre to include a cycling hub on Exeter's Green Circle and family activity trails around the Ludwell valley. The team is working to submit a planning application for the scheme in 2022/23.
2. In 2020, a consultation in the Newtown area engaged with the local community to discuss and explore perceptions towards walking and cycling. An options appraisal has been developed in 2021 which will be consulted on in 2022. The community will be asked for their opinions on a range of public realm improvements, parklets and highway interventions which will enable and encourage more people to use active travel modes within the Newtown area.
3. The Sport England Local Delivery Pilot team has developed and tested the governance and application structure for communities to be able to implement localised, regular closures of roads within their neighbourhoods. For specific periods this will provide sections of roads where the priority will be given to activity

(play) rather than travel.. The SELDP team was also involved in the school streets projects discussed below.

4. Work has continued at Water Lane, where the Council is building a large solar array with battery storage which will power a fleet of electric refuse collection vehicles (to be delivered in 2022).
5. Scrutiny of planning applications for air quality impacts, including making objections to developments on air quality grounds where this is justified and the negotiation of mitigation in accordance with Council and national planning policy.
6. From 1st Jan 2020 adopted policy required the Hackney carriage fleet to be 50% Euro 6 wheelchair accessible vehicles and 50% ULEV saloon cars with a stated emission level of 75g km CO₂ or below. This policy continues to be implemented.
7. A reduction in NOx emissions from buildings as a result of a variety of measures intended primarily to address fuel poverty and carbon emissions. These include progressing plans for the next phase of PassivHaus standard homes by Exeter City Council, completion of an Extra Care facility and a leisure centre and swimming pool both meeting the PassivHaus standard and continued implementation of district heating schemes to provide heating and hot water to 2800 homes at Monkerton, Tithebarn, Mosshayne, Pinn Court and Park Farm, and Exeter Science Park.
8. The new bus station was opened, which provides improved facilities for public transport users in the city.
9. The City Council is partners with Devon County Council and Co Delivery in a scheme which secured an £80,000 grant from the Department for Transport Energy Saving Trust to expand the capabilities of e-cargo bikes for business travel. Nine electric cargo bikes have been secured for use within the partner organisations, Devon County Council, Exeter City Council, University of Exeter and Royal Devon & Exeter NHS Foundation Trust (RD&E). These are now all operational including at the City Council where three bikes are used by the Environmental Health and Community Safety team to replace vehicle trips. Four bikes have expanded the eCargo Co Delivery courier service in Exeter, enabling more businesses to deliver goods across the city sustainably. This pilot project seeks to encourage the transition to carbon neutral modes of business travel. It's estimated the scheme will

help to save more than 20,000 miles a year that are currently made by petrol and diesel vehicles.

10. Devon County Council published a new Transport Strategy in 2020 with three themes: Greater Connectivity, Greater Places for People and Greater Innovation. Devon County Council are now working through implementation plans for this and working closely with Exeter City Council to link with the Liveable Exeter sites and vision.

Key targets within the strategy include:

- 50% of trips by foot or cycle within the city;
- Removal of air quality exceedances in the city.

11. Work has continued on a draft Exeter Local Cycling and Walking Infrastructure Plan.
12. Pop up measures to facilitate social distancing and active travel were introduced in 2020. The changes include the introduction of a new 5km cross city route (E9 Newcourt/Pynes Hill to City centre), supplemented with new crossings (eg at Russell Way). Some of these pop-up measures have been made permanent in 2021, such as the road closures and modal filters on Ludwell Lane, Dryden Road and Wonford Road. Work to make the Magdalen Street section permanent was ongoing in 2021.
13. Permanent school streets introduced at Whipton Barton School and Ladysmith School.
14. Filtered permeability plans for the whole Heavitree area are still under development although some elements have been delivered already, including the modal filter on Homefield Road and contra-flow cycle lane on Park Place.
15. Work was completed on a new Park and Change site at the Science Park and the site has been opened.
16. Work continues on a new station at Marsh Barton.
17. Work commenced to re-open the Okehampton railway line to daily services. This will provide a valuable alternative to car travel for people coming into the city from the area north of Dartmoor and increased service frequency from Crediton.

18. The local Co-Cars car club now includes 27 location including 36 cars and one van (23 of which are electric). Car Clubs are expected to expand further in 2022 with more electric car clubs as part of the Rapid Charging Exeter project.
19. Continued expansion of Co-Bikes (the local on-street e-cycle hire scheme) to now include 26 hire and docking locations.
20. Further development of the cycle network in and around the city, particularly plans for route E4 where detailed designs are being worked up for the Stoke Hill roundabout and Union Road section.
21. New cycle parking provision in the city's parks and open spaces (funded by DCC).
22. DCC restarted their Travel Planning service provided to new residential developments.
23. Bus patronage recovered to some extent from the effect of Covid 19 lockdowns. Total patronage on Devon's bus network in 2018/19 (the last year for which data is unaffected by the pandemic) was approximately 23.7 million passenger journeys. There was already a downward trend prior to Covid because this was a 10% reduction on the 2011/12 figure of 26.3 million. In 2019/20 patronage this reduced slightly to 23.3 million, partially due to the national lockdown in March 2020, but 2020/21 figures were most markedly impacted, with total patronage falling to just 8.1 million. Figures improved slightly in 21/22 but whole year figures were below what would otherwise have been expected. Figures for 21/22 were just below 15 million (previous predictions cited this at 16.5 million).
24. Tour of Britain. A stage of the race finished in Exeter with successful events being run alongside to inspire the next generations of cyclists and also encourage greater participation within the sport.
25. Supporting Ride-On cycling to deliver 25 days of free public Dr-Bike sessions in the City Centre, enabling members of the public to get a bike maintenance check and therefore ride it more frequently.
26. Delivering 5 Cycle Celebration events across the city (and Cranbrook), engaging with between 600 and 750 people. These events enable members of the community to try cycling, to re-engage with cycling or to just meet up with other people around the shared aspect of community activity. The longer-term output of these events will be to inspire the community to take up cycling or perhaps return to cycling.

Exeter City Council

Exeter City worked to implement these measures in partnership with the following stakeholders during 2021:

- Neighbouring authorities
- Devon County Council
- Sport England
- Exeter City Futures

Exeter City Council expects the following measures to be completed over the course of the next reporting year:

- Further refinement of the net zero plan for Exeter, in conjunction with Exeter City Futures.
- Implementation of the Transport Strategy by DCC, in conjunction with the Active and Healthy People Programme team.
- Devon County Council's residential travel planning services to be integrated with the Sport England Local Development Pilot work.
- An Exeter Local Cycling and Walking Infrastructure Plan is being developed for publication in 22/23 (to be incorporated into the Exeter Plan and future Devon Local Transport Plan).
- Sport England Project work will continue; including on the Wonford Health and Wellbeing Centre, Newtown active neighbourhood, enabling road closures for play streets and community events, community builders and social prescribing.
- Work to enable the delivery of a Water Lane low traffic neighbourhood through redevelopment of brownfield land.
- Three electric bin lorries will be delivered in summer 2022.
- All new vehicles entering the Council's fleet are likely to be electric (unless operational requirements make this impossible).
- Education projects such as Junior Life Skills will re-start after Covid-19.
- 10 new Co-Cars sites are planned.
- A decision will be made on an experimental traffic order for the Heavitree area filtered permeability project.
- Marsh Barton station to be opened.

- The Okehampton railway line will operate an hourly service in 2022 and feasibility work will commence on a possible future Okehampton Parkway station.
- Further improvements will take place to the E4 cycle route linking the new development areas at Monkerton, Tithebarn and Cranbrook with the University. This will make it safer and easier to make journeys by bike.
- The highway changes to make Magdalen Road one way and widen the cycle route will be made permanent in 22/23.
- £14m of funding (over 3yrs) has been received by Devon County Council for its Bus Service Improvement Plan across the County.

Exeter City Council's priorities for the coming year are to continue to progress the AQAP, in conjunction with the development and implementation of the city and county's Climate Emergency plans and in the context of economic conditions.

The principal challenges and barriers to implementation that Exeter City Council anticipates facing are further funding constraints within Local Government, available officer time, and public, business and political appetite for measures that may be perceived as potentially harming or delaying economic growth (even if this is not the case).

Progress on the following measures has been slower than expected due to:

- Changes to the proposed planning policy framework. The authorities within the Greater Exeter area are no longer working together on shared planning policy (GESp) but are instead producing individual plans. The Exeter Plan will include the same transport aspirations that would have been in the GESp and will align with the Transport Strategy for the city. Cross-boundary issues will now be addressed in an East Devon, Exeter, Mid Devon and Teignbridge Joint Strategy.
- Use of public transport reduced as a result of the pandemic. The future of public transport and the measures needed to encourage passengers back safely will be considered in 2022 and beyond in Devon County Council's Bus Service Improvement Plan.

Exeter City Council anticipates that the measures stated above and in **Error! Reference source not found.** will achieve compliance in the Exeter AQMA although the full impact of Covid-19 and recovery (including financial pressures on local authorities) is not yet understood. Progress with implementing the priority measures and all the actions listed in Table 2.2 will be reported on in the next Annual Status Report in 2023 and changes can be made to the AQAP if required by the mechanism of future ASRs.

Table 2.2 – Progress on Measures to Improve Air Quality

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
1 (green measure)	Filtered permeability projects to be considered for the city with an initial focus on the Heavitree corridor area and including a feasibility study for corridor improvements	Policy Guidance and Development Control	Other policy	2019	Rolling Programme	DCC via Transport Strategy and Exeter City Futures, Sport England Local Delivery Pilot	SELDP, DCC, Developer Contributions, Grant Funding where available and ECC	NO	Partially Funded	£50k - £100k	Implementation	The target for design of changes to the Heavitree corridor area will be to eliminate exceedences. Details will be finalised as the design emerges, but it is currently expected that a reduction in emissions of between 39 and 78% will be required	Implementation of scheme(s)	Pop up cycle routes and road closures in Heavitree and around the RD&E hospital introduced in 2020 have been made permanent. School Street introduced at Ladysmith school. A decision on an experimental traffic order for the Heavitree area scheme will be made in 2022. A wider package of measures, including play streets is being developed by the Sport England team.	Plans will be developed for individual areas in consultation with communities.

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
2 (amber measure)	Consider access restrictions which will reduce the dominance of private cars, including in the city centre	Policy Guidance and Development Control	Other policy	2019	Ongoing Programme, next phases to be implemented 2021	DCC via Transport Strategy and Exeter City Futures	DCC, grant funding as available and developer contributions	NO	Partially Funded	£100k - £500k	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of scheme(s)	Traffic reduction scheme for Bartholomew Street West implemented and lane closure on Queen Street in place. Roadside interviews in the city centre undertaken to inform a city centre traffic strategy. Liveable Exeter vision for the city published, which includes development on car parks, and a reduction in road space for cars. Initial work on South Street project is progressing, to include improved cycle routes, and connections between the city centre and the Quay area but requires updating in light of post-Covid changes. Local Walking and Cycling Implementation plan to be published 2022/3.	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding. Draft City Centre Strategy requires review in light of post Covid changes.
3 (amber measure)	New transport links and Park & Change facilities to make it easier for those living outside the city to choose active and sustainable travel modes	Transport Planning and Infrastructure	Other	2019	Ongoing Programme	DCC via Transport Strategy	DCC, grant funding as available and developer contributions	NO	Partially Funded	£100k - £500k	Implementation	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of schemes	Pinhoe Park and Change to be delivered as part of residential development in area. Park and Change at Science Park opened.	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
4 (yellow measure)	Changes to parking charges to discourage car travel in peak times, encourage longer stays in the city centre and support other measures in this plan, such as active travel	Traffic Management	Other	2019	2021	ECC via Local Plan	ECC	NO	Not Funded	£100k - £500k	Planning	<1% reduction in emissions. This measure is expected to have an indirect effect on emissions, such that it is not possible to reliably quantify the impact of this measure alone.	Implementation of changes	This was being actively pursued with ECCs equipment providers but future structure of parking charges and plans for city centre car parks are being considered post Covid.	Draft City Centre Strategy requires review in light of post Covid changes.
5	Maximise efficiency of existing highway network	Transport Planning and Infrastructure	Other	2019	Ongoing programme	DCC via Transport Strategy and Exeter City Futures	DCC, ECC, grant funding as available and developer contributions	NO	Partially Funded	£500k - £1 million	Planning	TBC, based on predicted changes to traffic parameters provided by DCC as plans for specific locations emerge and are consulted upon	Implementation of scheme(s)	In planning phase	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding
6 (amber measure)	Access Fund and cycle/walking network, Local Walking and Cycling Infrastructure Plan (LCWIP)	Transport Planning and Infrastructure	Other	2019	Ongoing, as DCC have current plans for upgrades to cycling and walking infrastructure which will evolve as the LCWIP develops	DCC via Transport Strategy	Access Fund	NO	Partially Funded	£1 million - £10 million	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Adoption of LCWIP	Planned E4 Cycle Route improvements ongoing and E9 route made permanent. The LCWIP document will be consulted on in 2022	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding
7 (amber measure)	Expand school and community projects, car free events and events promoting active travel, building on the success of the Heavitree pilot	Promoting Travel Alternatives	Other	2019	Ongoing programme, which evolves as previous events and projects are evaluated	ECC via Sport England Local Delivery Pilot & Exeter City Futures	Sport England funding	NO	Partially Funded	£50k - £100k	Implementation	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	School Streets introduced	Trials at three primary schools in 2020, two made permanent (Whipton Barton and Ladysmith). Community Builders and SELDP local Physical Activity Organisers delivered play street 'non car events'	Plans will be developed in individual areas with local communities. Increased community cohesion and activism as a result of Covid may benefit this work.

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
8 (amber measure)	Use social prescribing and community building to help individuals get and stay active	Public Information	Other	2019	Ongoing programme, which evolves as previous events and projects are evaluated	ECC via Sport England Local Delivery Pilot and local Health Service providers	Sport England funding	NO	Partially Funded	£100k - £500k	Implementation	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of scheme	Behaviour change training delivered for all Community Builders and Community Connectors to provide support to people to lead active lifestyles. New social prescribing posts recruited to support health & wellbeing of Children and Young Families.	The Covid recovery plans seek to retain and enhance the increase in activity levels, community activism, volunteering and contact with nature seen during lockdown.
9 (amber measure)	High quality parks, play areas, sport and leisure facilities	Promoting Travel Alternatives	Other	2019	Ongoing programme	ECC via Physical Activity Strategy, Sport England Local Delivery Pilot & Local Plan	Sport England funding	NO	Partially Funded	£50k - £100k	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes)	Implementation of scheme(s)	Physical Activity Strategy published and flagship programmes in development - Wonford Health & Wellbeing Centre to be delivered first. Focus on sites becoming more accessible for sustainable transport and increased active travel infrastructure	Obtaining necessary permissions and consents, and funding
10 (yellow measure)	Communications plan, to support measures that will achieve modal shift	Public Information	Other	2019	Ongoing (iterative process of developing and implementing communications / messages)	ECC via Sport England Local Delivery Pilot & Exeter City Futures	ECC via existing internal budgets, Sport England Local Delivery Pilot & Exeter City Futures	NO	Partially Funded	£10k - 50k	Implementation	<1% reduction in emissions. The purpose of this measure is to enable the Council to explain why it is taking action. The measure itself is unlikely to have significant impact on its own.	Communications strategy developed through SELDP - 'Let's Move'. Focus on small steps for 'least active' residents and communities to move more in their local neighbourhoods. Walking & Cycling central to this communications strategy		

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
11 (yellow measure)	Promote and expand Co-Bikes network, and support the roll out of electric car club vehicles to more locations	Promoting Travel Alternatives	Other	2019	Ongoing programme	DCC, ECC via Transport Strategy, Sport England Local Delivery Pilot & Exeter City Futures	Ongoing programme, dependent on funding availability	NO	Partially Funded	£100k - £500k	Implementation	<1% reduction in emissions. This measure will have indirect benefits for air quality by facilitating active travel and supporting a change in car ownership patterns. It is not possible to reliably model the impact of this measure alone on emissions	Implementation of expansions to schemes, as funding is obtained	Significant upgrades to the Co-Bikes and Co-Cars networks have taken place and are planned	Dependent on funding availability
12 (amber measure)	An improved multi-modal public transport network, incorporating cleaner bus technologies	Transport Planning and Infrastructure	Other	2019	Ongoing programme	DCC via GESp, Transport Strategy and Exeter City Futures	TBC	NO	Partially Funded	> £10 million	Planning	4% reduction in emissions at East Wonford Hill (shared across all measures which will in combination achieve the targeted reduction in private car commutes). As an example, 33% bus electrification would achieve 5% fall in emissions at East Wonford Hill and 66% electrification would achieve 10% reduction.	Implementation of agreed plans	14 Euro 6 busses have entered the fleet and significant new additions to the city's bus network. Plans to be reviewed in light of £14m of funding (over 3yrs) which has been received by Devon County Council for its Bus Service Improvement Plan across the County	Dependent on funding availability and future demand for public transport.

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
13	Developers to mitigate the effects of their development on air quality	Policy Guidance and Development Control	Other policy	2019	Ongoing	GESP team, ECC via GESP & Local Plan	Resourced by the GESP authorities	NO	Partially Funded	£50k - £100k	Planning	The purpose of this measure is to limit the impact of new development. It is not intended to reduce emissions on the current baseline (although some reduction may be achieved as a result in practice)	Developments delivered	Continue to implement policy in a robust manner eg when considering retail park applications and new housing.	The GESP timetable has been subject to some delay from when the AQAP was published. The Transportation Strategy describes what the future of Transport in Exeter should look like, but without a matching local plan in all the District Council areas, the necessary contributions and infrastructure will have to be negotiated on a site by site basis as each application is decided.
14	Policies deliver development where private car use is not the only realistic travel choice	Policy Guidance and Development Control	Other policy	2019	Ongoing	GESP team, ECC via GESP & Local Plan	Resourced by the GESP authorities	NO	Partially Funded	£50k - £100k	Planning	The purpose of this measure is to limit the impact of new development. It is not intended to reduce emissions on the current baseline (although some reduction may be achieved as a result in practice)	Developments delivered	Liveable Exeter vision for development in the city which is not reliant on car travel.	Work on the Liveable Exeter project continues but the GESP timetable has been subject to some delay from when the AQAP was published. (see measure 13).

Measure No.	Measure	Category	Classification	Year Measure Introduced	Estimated / Actual Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Reduction in Pollutant / Emission from Measure	Key Performance Indicator	Progress to Date	Comments / Barriers to Implementation
15 (yellow measure)	More things to see/do in the City Centre, encouraging longer stays and supporting events which promote sustainable travel, active and healthy lifestyles.	Policy Guidance and Development Control	Other policy	2019	Ongoing programme	ECC via Local Plan	TBC once strategy adopted	NO	Partially Funded		Planning	<1% reduction in emissions. This measure will not have a significant direct impact on emissions, but will support the step change in behaviour which will be required to meet the City Council's aspirations for active and healthy travel.	Completion of Strategy and then implementation	St Sidwells Point leisure centre open. Consultants are reviewing draft City Centre Strategy in light of post-Covid changes.	The impact of Covid-19 on the city centre and travel to the city centre will be better understood as the year progresses
16	Better information to raise awareness and improve the level of understanding of air pollution and transport issues within communities	Public Information	Other	2019	Ongoing (iterative process of developing and implementing communications / messages).	ECC	Internal ECC budgets	NO	Partially Funded	£10k - 50k	Planning	Enable the Council to explain why it is taking action. Measure itself is unlikely to have significant impact on its own.		Baseline evidence report completed subject to annual review following publication of each year's measurement data and any new research, national guidance etc.	Future communications may be brought under the umbrella of the Net Zero plans
17	An air pollution monitoring network that supports the measures in this action plan	Public Information	Other	2019	Ongoing evolution of network may be required, as needs change	ECC	Internal ECC budgets or grant funding if available	NO	Funded	< £10k	Implementation	This measure would not in itself deliver reductions in emissions, but would support the other measures in this plan	monitoring equipment operational	Diffusion tube monitoring network remains under review. The potential benefits of new sensor technologies has been evaluated, but no projects have currently been identified where these types of equipment would provide added value.	

2.3 PM_{2.5} – Local Authority Approach to Reducing Emissions and/or Concentrations

As detailed in Policy Guidance LAQM.PG16 (Chapter 7), local authorities are expected to work towards reducing emissions and/or concentrations of PM_{2.5} (particulate matter with an aerodynamic diameter of 2.5µm or less). There is clear evidence that PM_{2.5} has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases.

Public Health England's Public Health Outcomes Framework tool shows that in Exeter in 2020 the fraction of mortality attributable to particulate air pollution was 5.2%. This is equal to the regional figure for the south west (5.2%) and below the national level of 5.6%. Exeter therefore has levels of particulate matter which are causing harm, but this problem is less severe than in over half the country. The data is available at [this link](#).

There is now a capacity for direct monitoring of PM_{2.5} in Exeter, since August 2018. This showed PM_{2.5} concentrations of 8.4 µg/m³ at RAMM and 7.5 µg/m³ at Alphington Street in 2021. National modelling by PHE (available via the website above) suggests that for 2020 (the most recent data available), the average figure for the city as a whole was 6.2 µg/m³. The annual average EU limit value for PM_{2.5} is 25 µg/m³ so there is no suggestion that this level is being exceeded in Exeter. However the council still has a duty to reduce emissions of and exposure to this pollutant.

During 2022, Exeter City Council will be taking the measures described in Table 2.2 that will address PM_{2.5} as well as NO₂.

Approximately 60% of Exeter is designated as Smoke Control Areas. Controls on solid fuel combustion appliances and fuels are likely to have restricted PM_{2.5} emissions in these areas to some extent.

3 Air Quality Monitoring Data and Comparison with Air Quality Objectives and National Compliance

This section sets out the monitoring undertaken within 2021 by Exeter City Council and how it compares with the relevant air quality objectives. In addition, monitoring results are presented for a five-year period between 2017 and 2021 to allow trends to be identified and discussed.

3.1 Summary of Monitoring Undertaken

3.1.1 Automatic Monitoring Sites

Exeter City Council undertook automatic (continuous) monitoring at two sites during 2021. Table A.1 in Appendix A shows the details of the automatic monitoring sites. NB. Local authorities do not have to report annually on the following pollutants: 1,3 butadiene, benzene, carbon monoxide and lead, unless local circumstances indicate there is a problem. This [page](#) presents automatic monitoring results for Exeter City Council, with automatic monitoring results also available through the UK-Air website.

Maps showing the location of the monitoring sites are provided in Appendix D. Further details on how the monitors are calibrated and how the data has been adjusted are included in Appendix C.

3.1.2 Non-Automatic Monitoring Sites

Exeter City Council undertook non- automatic (i.e. passive) monitoring of NO₂ at 83 sites during 2021. Table A.2 in Appendix A presents the details of the non-automatic sites.

Maps showing the location of the monitoring sites are provided in Appendix D or at this [link](#). Further details on Quality Assurance/Quality Control (QA/QC) for the diffusion tubes, including bias adjustments and any other adjustments applied (e.g. annualisation and/or distance correction), are included in Appendix C.

3.2 Individual Pollutants

The air quality monitoring results presented in this section are, where relevant, adjusted for bias, annualisation (where the annual mean data capture is below 75% and greater than 25%), and distance correction. Further details on adjustments are provided in Appendix C.

3.2.1 Nitrogen Dioxide (NO₂)

Table A.3 and Table A.4 in Appendix A compare the ratified and adjusted monitored NO₂ annual mean concentrations for the past five years with the air quality objective of 40µg/m³. Note that the concentration data presented represents the concentration at the location of the monitoring site, following the application of bias adjustment and annualisation, as required (i.e. the values are exclusive of any consideration to fall-off with distance adjustment).

For diffusion tubes, the full 2021 dataset of monthly mean values is provided in Appendix B. Note that the concentration data presented in Table B.1 includes distance corrected values, only where relevant.

Table A.5 in Appendix A compares the ratified continuous monitored NO₂ hourly mean concentrations for the past five years with the air quality objective of 200µg/m³, not to be exceeded more than 18 times per year.

The national bias adjustment figure (0.84) has been used this year as a result of low data capture at the co-located diffusion tube site. The local Exeter bias factor (0.76) is lower than the national one so if that had been used the final reported concentrations would have been slightly lower. The Council has followed DEFRA guidance in choosing to use the national factor and it is considered robust but the choice of factors does not greatly affect the conclusions drawn.

The data shows that no locations measured an exceedence of the proxy for the hourly objective in 2021 (an annual average of 60µg/m³).

Only one site exceeded the objective for annual average concentrations. This was East Wonford Hill (DT57) where concentrations were slightly above the limit (42.2 µg/m³ against an objective of 40). The data for all the monitoring sites shows a significant fall in concentrations between 2019 and 2020 with a partial rebound in 2021 (see Figure A.1 and the data in Table A.4). This can be attributed in large part to changes in traffic flows as a

result of lockdowns and COVID-19 (see table 15.1). Ongoing improvements in vehicle emission technologies will also have played a part however.

Table 15.1 Traffic Flow Data (24 hour average)

Site Name	2015	2020	2021	% change from 2015 to 2020	% change from 2015 to 2021
Pinhoe Road (Whipton)	20830	16538	17,218	-21%	-17%
Heavitree Road	17507	14832	16,632	-15%	-5%
Honiton Road	26832	22789	23,936	-15%	-11%
Topsham Road (King George)	26057	20702	23,635	-21%	-9%
Alphington St	28799	22012	23,401	-24%	-19%
Cowick St	14840	10913	11,916	-26%	-20%
Total	134865	107786	116,738	-20%	-13%

2016 count data is shown for Heavitree Road because the 2015 data was faulty

2021 count data for Pinhoe Road is estimated because of incomplete data

2020 was exceptional, in terms of the change in traffic flows, so the Council had no plans to amend the AQMA as a result of changes to NO₂ concentrations seen in that year. The last Annual Status Report (published in 2021) recommended that longer term trends were monitored to confirm which exceedences have indeed been permanently resolved. There will also always be natural variation between years as a result of local small changes in traffic flows (road works etc) and weather patterns which make identifying any trend difficult over short periods of time even where other factors are stable.

Given that traffic flows did not fully return in 2021 to pre-pandemic levels (table 15.1) it is again recommended that the AQMA order and boundary remain unchanged. It seems highly likely that exceedences at locations such as the Blackboy Road / Pinhoe Road junction (DT42 and DT43) have been permanently resolved given that they had fallen below 40 µg/m³ in 2018 and therefore have been below the objective for 4 years. However the Council does not intend to review the AQMA order or AQMA boundary until 2024 when the current AQAP terminates. Before this date action to improve air quality will continue to be focussed on those areas within the AQMA where exceedences have been measured recently (East Wonford Hill). A complete review will commence in 2024 together with the necessary reports and consultation for an amended AQMA (if required) and subsequently a new AQAP.

There were no changes to the monitoring network in 2021. The Council considers that it has good coverage of all areas where exceedences might occur at a relevant location as well as any areas which might be expected to see significant traffic growth (as a result of new development etc). Monitoring is focused at expected hot spots and relevant worst-case locations. No further revision to the monitoring network is therefore currently proposed in order to identify suspected exceedences, although regular review of the network will continue to ensure that monitoring is taking place at all areas of potential exceedance at locations of relevant exposure.

3.2.2 Particulate Matter (PM₁₀)

Table A.6 in Appendix A: Monitoring Results compares the ratified and adjusted monitored PM₁₀ annual mean concentrations for the past five years with the air quality objective of 40µg/m³.

Table A.7 in Appendix A compares the ratified continuous monitored PM₁₀ daily mean concentrations for the past five years with the air quality objective of 50µg/m³, not to be exceeded more than 35 times per year.

There were no measured exceedences of the PM₁₀ air quality objectives in Exeter in 2021. Data capture at CM2 (Alphington Street) was below 90% (because of equipment breakdowns) but above the 75% threshold where annualisation is required. Annual average concentrations have been broadly consistent over the last five years, with some interannual variability, and there was just one exceedence of an hourly mean of 50µg/m³ in 2021 (at RAMM). The longer-term trend in annual concentrations is a decline since 2005 or 2006.

3.2.3 Particulate Matter (PM_{2.5})

Table A.8 in Appendix A presents the ratified and adjusted monitored PM_{2.5} annual mean concentrations for the past five years.

There were no measured exceedences of the PM_{2.5} air quality objectives in Exeter in 2020. Data capture at CM2 (Alphington Street) was below 90% (because of equipment breakdowns) but above the 75% threshold where annualisation is required. There is no obvious trend in concentrations over the period when data has been collected.

3.2.4 Ozone (O₃)

Table A.9 in Appendix A presents the ratified continuous monitored O₃ 8-hour mean concentrations for the past 5 years with the air quality objective of 100µg/m³, not to be exceeded more than 10 times per year.

Although not a local air pollutant, Exeter City Council has the facility to measure ozone (O₃) levels. Table A.9 in Appendix A compares the ratified continuous monitored O₃ concentrations for 2021 with the nationally applied air quality objective for this pollutant. The objective was exceeded in Exeter in 2019, which may be a result of the fine summer. In 2020, the number of occasions when there was an 8 hour running mean of >100 micrograms per cubic meter increased significantly. This could have been caused by the interaction between NO_x and ozone in the atmosphere. With lower concentrations of NO being emitted during lockdowns, less ozone would be converted to oxygen (O₂). There were no exceedances in 2021. As stated above, ozone is not a local air pollutant so Exeter City Council is not responsible for reporting on, or mitigating, exceedances of this objective. This is the responsibility of DEFRA.

Appendix A: Monitoring Results

Table A.1 – Details of Automatic Monitoring Sites

Site ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Monitoring Technique	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Inlet Height (m)
CM1	Exeter Roadside	Kerbside	291939	92830	NO ₂ ; O ₃ ; PM ₁₀ ; PM _{2.5}	YES	Chemiluminescent; UVA; Optical Light Scattering	0	1	1.7
CM2	Alphington Street	Roadside	291670	91773	PM ₁₀ ; PM _{2.5}	NO	Optical Light Scattering	12	3	1.7

Notes:

(1) 0m if the monitoring site is at a location of exposure (e.g. installed on the façade of a residential property).

(2) N/A if not applicable

Table A.2 – Details of Non-Automatic Monitoring Sites

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT1	High Street /Castle Street	Kerbside	292199	92814	NO2	YES, Exeter AQMA	50.0	0.5	No	2.0
DT2	Longbrook Street	Kerbside	292315	93016	NO2	NO	0.0	1.0	No	1.7
DT3	New North Road	Kerbside	292185	93049	NO2	YES, Exeter AQMA	0.0	1.0	No	2.0
DT4	Queen Street	Kerbside	291779	93011	NO2	YES, Exeter AQMA	0.0	1.5	No	2.0
DT5, DT6	RAMM 2	Kerbside	291944	92826	NO2	YES, Exeter AQMA	0.0	1.0	Yes	1.7
DT7	High Street Guildhall	Roadside	291984	92626	NO2	YES, Exeter AQMA	0.0	2.0	No	2.0
DT8	North Street	Kerbside	291895	92569	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT9	South Street	Roadside	291943	92511	NO2	YES, Exeter AQMA	4.0	2.5	No	2.0
DT10	Market Street	Kerbside	291833	92433	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT11	Magdalen Street	Kerbside	292291	92292	NO2	YES, Exeter AQMA	6.0	2.0	No	1.7
DT12	Magdalen Street façade	Kerbside	292422	92320	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT13	Archibald Road	Roadside	292590	92743	NO2	NO	0.0	1.5	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT14	Heavitree Road inbound	Roadside	292832	92731	NO2	YES, Exeter AQMA	0.0	10.0	No	2.0
DT15	Heavitree Road outbound	Kerbside	292703	92807	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT16	Holloway Street	Kerbside	292378	92039	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT17	Carder's Court, Shilhay	Roadside	291699	92091	NO2	NO	0.0	15.0	No	1.7
DT18	Rear of Gervase Avenue	Roadside	291657	91973	NO2	YES, Exeter AQMA	5.0	18.0	No	2.0
DT19	Alphington Street	Kerbside	291669	91812	NO2	YES, Exeter AQMA	0.0	1.0	No	2.0
DT20	Alphington Road inbound	Roadside	291532	91349	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT21	Queen's Road	Urban Background	291460	91390	NO2	NO	8.0	2.0	No	1.7
DT22	Alphington Road outbound	Roadside	291509	91151	NO2	YES, Exeter AQMA	0.0	8.0	No	1.7
DT23	Alphington Road outer	Roadside	291518	90813	NO2	YES, Exeter AQMA	15.0	2.0	No	1.7
DT24	Church Road Alphington	Roadside	291691	90425	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7
DT25	Church Road II	Kerbside	291767	90160	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT26	Alphington Cross	Roadside	291520	90531	NO2	YES, Exeter AQMA	0.0	1.8	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT27	Cowick Street (Cowick Lane)	Kerbside	290864	91725	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT28	Cowick Street (inbound)	Roadside	291249	91874	NO2	YES, Exeter AQMA	0.0	4.0	No	1.7
DT29	Cowick Street (outbound)	Roadside	291376	91944	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7
DT30	Cowick Street (Exe Bridges)	Roadside	291500	92055	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT31	Okehampton Street	Roadside	291351	92169	NO2	YES, Exeter AQMA	0.0	4.0	No	1.7
DT32	Station Road	Roadside	290826	93598	NO2	NO	0.0	2.1	No	1.7
DT33	Bonhay Road (St Clements Lane)	Roadside	291253	93299	NO2	YES, Exeter AQMA	0.0	2.0	No	2.0
DT34	Red Cow Village	Kerbside	291242	93483	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT35	Red Cow II	Kerbside	291272	93468	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT36	Cowley Bridge Road	Roadside	291054	94399	NO2	YES, Exeter AQMA	0.0	4.0	No	1.7
DT37	Pennsylvania Road	Roadside	292391	93291	NO2	NO	0.0	1.0	No	1.7
DT38	York Road School	Roadside	292469	93245	NO2	NO	3.5	2.5	No	1.7
DT39	York Road	Kerbside	292579	93146	NO2	NO	1.5	0.1	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT40	Union Road	Roadside	293047	93877	NO2	NO	0.0	1.0	No	1.7
DT41	Pinhoe Road inbound	Roadside	293405	93395	NO2	YES, Exeter AQMA	0.0	3.0	No	1.7
DT42	Pinhoe Road (Polsloe Road)	Kerbside	293251	93375	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT43	Blackboy Road (Polsloe Road)	Roadside	293227	93356	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT44	Beacon Heath	Kerbside	295068	94487	NO2	NO	10.0	1.0	No	1.7
DT45	Venny Bridge	Kerbside	295888	94101	NO2	NO	8.0	1.0	No	1.7
DT46	Pinhoe	Kerbside	296418	94470	NO2	NO	20.0	0.1	No	1.7
DT47	Langaton Lane	Urban Background	296984	94327	NO2	NO	12.0	0.5	No	1.7
DT48	Pinn Lane	Roadside	296494	93782	NO2	NO	9.5	1.0	No	2.0
DT49	Pinhoe Road (Fairfield Avenue)	Roadside	295413	93689	NO2	YES, Exeter AQMA	0.0	5.0	No	1.7
DT50	East John Walk	Urban Background	293091	92825	NO2	NO	1.5	N/A	No	1.7
DT51	Magdalen Road (Barrack Road)	Kerbside	293448	92419	NO2	YES, Exeter AQMA	0.0	1.0	No	1.7
DT52	Livery Dole	Roadside	293418	92497	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT53	Rowancroft	Kerbside	293533	92473	NO2	YES, Exeter AQMA	0.0	0.2	No	2.0
DT54	Salutary Mount	Roadside	293738	92396	NO2	YES, Exeter AQMA	4.5	1.5	No	1.7
DT55	Fore Street Heavitree outbound	Roadside	293781	92409	NO2	YES, Exeter AQMA	6.0	4.0	No	1.7
DT56	Fore Street Heavitree inbound	Roadside	294043	92359	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT57	East Wonford Hill	Roadside	294410	92310	NO2	YES, Exeter AQMA	0.0	2.0	No	1.7
DT58	Honiton Road	Roadside	295203	92378	NO2	YES, Exeter AQMA	20.0	1.5	No	2.0
DT59	Honiton Road façade	Roadside	295191	92395	NO2	NO	0.0	15.0	No	1.7
DT60	Sidmouth Road lamp post	Roadside	295466	92365	NO2	YES, Exeter AQMA	7.0	2.0	No	2.0
DT61	Sidmouth Road Middlemoor	Roadside	295636	92232	NO2	YES, Exeter AQMA	0.0	10.0	No	1.7
DT62	Newcourt Way	Roadside	295710	90571	NO2	NO	17.0	2.0	No	2.0
DT63	Topsham Road (Countess Wear)	Roadside	294694	90001	NO2	YES, Exeter AQMA	0.0	5.0	No	2.0
DT64	Bridge Road (Countess Wear)	Roadside	294652	89974	NO2	NO	0.0	15.0	No	1.7
DT65	High Street Topsham	Kerbside	296415	88477	NO2	NO	0.0	1.0	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT66	Topsham Road (Tollards Road)	Roadside	294227	90435	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7
DT67	Topsham Road (Barrack Road)	Roadside	293213	91245	NO2	YES, Exeter AQMA	0.0	10.0	No	1.7
DT68	Riverside Valley Park	Urban Background	292291	91678	NO2	NO			No	2.0
DT69	Cowick Barton Playing Fields	Urban Background	291016	91304	NO2	NO			No	1.7
DT70	Exwick Playing Fields	Urban Background	291298	92593	NO2	NO			No	2.0
DT71	Heavitree Pleasure Ground	Urban Background	294387	92611	NO2	NO			No	2.0
DT72	Ladysmith School/Pretoria Road	Roadside	293617	93090	NO2	NO	1.5	1.5	No	1.7
DT73	Pennsylvania	Urban Background	293052	94185	NO2	NO	6.0	2.0	No	2.0
DT74	Northernhay Gardens	Urban Background	292056	93043	NO2	NO			No	2.0
DT75	Chudleigh Road	Roadside	291721	89727	NO2	YES, Exeter AQMA	0.0	4.0	No	2.0
DT76	Mill Lane	Urban Background	291555	90449	NO2	NO	8.5	1.0	No	2.0
DT77	Sidwell Street	Kerbside	292553	93082	NO2	YES, Exeter AQMA	6.0	1.0	No	2.0
DT78	Station Road Pinhoe	Other	296415	94165	NO2	NO	1.5	1.5	No	1.7

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m) ⁽¹⁾	Distance to kerb of nearest road (m) ⁽²⁾	Tube Co-located with a Continuous Analyser?	Tube Height (m)
DT79	Tithebarn Link Road	Roadside	296827	93886	NO2	NO	2.0	2.0	No	2.0
DT80	Exeter Road	Roadside	295967	88876	NO2	NO	14.5	3.0	No	2.0
DT81	St. Leonards Road	Roadside	292637	91991	NO2	NO	0.0	2.0	No	1.7
DT82	Newtown	Urban Background	292847	92911	NO2	NO	0.0	3.5	No	2.0
DT83	New Bridge St	Roadside	291655	92258	NO2	YES, Exeter AQMA	0.0	2.0	No	2.0
DT84	Lower Coombe St	Roadside	291897	92217	NO2	NO	2.0	10.0	No	1.7

Notes:

(1) 0m if the monitoring site is at a location of exposure (e.g. installed on the façade of a residential property).

(2) N/A if not applicable.

Table A.3 – Annual Mean NO₂ Monitoring Results: Automatic Monitoring (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
CM1	291939	92830	Kerbside		99.1	27.7	29.1	29.0	18.8	19.2

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG16.

Reported concentrations are those at the location of the monitoring site (annualised, as required), i.e. prior to any fall-off with distance correction.

Notes:

The annual mean concentrations are presented as µg/m³.

Exceedances of the NO₂ annual mean objective of 40µg/m³ are shown in **bold**.

All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

Concentrations are those at the location of monitoring and not those following any fall-off with distance adjustment.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table A.4 – Annual Mean NO₂ Monitoring Results: Non-Automatic Monitoring (µg/m³)

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
DT1	292199	92814	Kerbside		100.0	28.0	29.2	26.5	17.0	20.9
DT2	292315	93016	Kerbside		90.4	25.9	25.2	26.4	17.5	21.4
DT3	292185	93049	Kerbside		92.3	26.5	25.9	27.8	18.8	22.6
DT4	291779	93011	Kerbside		100.0	24.3	23.1	23.8	16.2	19.0
DT5, DT6	291944	92826	Kerbside		84.6	27.9	29.3	27.5	18.5	21.3
DT7	291984	92626	Roadside		100.0	24.4	26.0	22.6	15.7	20.4
DT8	291895	92569	Kerbside		100.0	35.7	33.9	35.7	22.6	27.9
DT9	291943	92511	Roadside		92.3	31.5	29.1	28.5	18.7	24.2
DT10	291833	92433	Kerbside		100.0	31.0	30.8	29.5	18.6	23.4
DT11	292291	92292	Kerbside		84.6	29.2	29.4	28.9	19.5	24.7
DT12	292422	92320	Kerbside		100.0	31.8	31.1	29.3	20.0	23.8
DT13	292590	92743	Roadside		100.0	20.8	21.6	19.6	13.2	16.8
DT14	292832	92731	Roadside		100.0	19.6	20.3	19.0	13.2	16.5

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
DT15	292703	92807	Kerbside		100.0	34.1	34.5	31.4	22.3	28.0
DT16	292378	92039	Kerbside		100.0	31.3	34.2	29.3	21.3	26.6
DT17	291699	92091	Roadside		90.4	22.0	22.4	21.4	15.5	18.3
DT18	291657	91973	Roadside		100.0	23.4	22.3	22.7	15.8	19.2
DT19	291669	91812	Kerbside		100.0	40.8	47.0	42.0	28.5	35.7
DT20	291532	91349	Roadside		100.0	33.9	33.6	31.3	22.4	27.4
DT21	291460	91390	Urban Background		100.0	13.7	15.3	12.7	9.1	11.7
DT22	291509	91151	Roadside		100.0	26.8	29.0	26.2	17.7	21.2
DT23	291518	90813	Roadside		100.0	23.4	27.3	23.4	15.3	20.6
DT24	291691	90425	Roadside		82.7	29.1	28.0	23.4	18.3	24.3
DT25	291767	90160	Kerbside		100.0	25.6	26.1	23.5	16.2	19.8
DT26	291520	90531	Roadside		100.0	32.7	31.3	30.2	20.4	25.6
DT27	290864	91725	Kerbside		100.0	37.0	39.9	38.7	26.8	31.6
DT28	291249	91874	Roadside		92.3	20.7	23.9	21.1	15.6	19.9

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
DT29	291376	91944	Roadside		100.0	33.6	43.4	34.4	24.3	29.8
DT30	291500	92055	Roadside		73.1	32.0	33.2	30.1	22.1	28.2
DT31	291351	92169	Roadside		100.0	24.6	25.2	24.3	17.3	20.6
DT32	290826	93598	Roadside		92.3	27.1	25.4	25.4	17.7	21.2
DT33	291253	93299	Roadside		100.0	28.7	30.9	26.8	19.2	24.7
DT34	291242	93483	Kerbside		100.0	38.0	38.3	36.0	26.5	32.1
DT35	291272	93468	Kerbside		100.0	31.9	31.4	31.1	21.5	26.0
DT36	291054	94399	Roadside		100.0	32.3	33.8	32.5	22.9	27.5
DT37	292391	93291	Roadside		100.0	26.7	28.6	28.4	18.3	23.2
DT38	292469	93245	Roadside		100.0	28.4	29.7	27.7	18.1	23.0
DT39	292579	93146	Kerbside		92.3	37.6	38.9	36.2	23.3	31.2
DT40	293047	93877	Roadside		92.3	24.0	28.0	26.4	16.7	21.0
DT41	293405	93395	Roadside		80.8	30.2	31.2	29.8	20.9	24.0
DT42	293251	93375	Kerbside		100.0	41.2	37.2	35.9	25.6	30.6

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
DT43	293227	93356	Roadside		100.0	29.2	28.2	25.7	19.2	23.5
DT44	295068	94487	Kerbside		100.0	19.7	20.3	17.8	13.6	15.1
DT45	295888	94101	Kerbside		100.0	18.5	19.1	18.0	14.2	16.6
DT46	296418	94470	Kerbside		100.0	23.3	24.8	23.1	18.4	21.8
DT47	296984	94327	Urban Background		90.4	15.7	18.7	17.9	13.3	15.1
DT48	296494	93782	Roadside		100.0	17.2	19.3	17.6	12.8	15.5
DT49	295413	93689	Roadside		100.0	18.9	19.7	17.9	12.6	15.8
DT50	293091	92825	Urban Background		100.0	14.5	14.5	14.0	9.7	11.6
DT51	293448	92419	Kerbside		100.0	37.2	39.7	35.5	24.3	29.4
DT52	293418	92497	Roadside		92.3	49.9	48.7	42.6	31.1	34.9
DT53	293533	92473	Kerbside		100.0	43.5	46.4	38.5	27.4	32.1
DT54	293738	92396	Roadside		92.3	52.7	53.6	43.4	32.7	37.3
DT55	293781	92409	Roadside		100.0	30.0	31.2	26.7	19.8	23.4
DT56	294043	92359	Roadside		100.0	40.9	43.4	40.3	29.0	32.2

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
DT57	294410	92310	Roadside		100.0	59.0	<u>61.9</u>	53.5	38.2	42.2
DT58	295203	92378	Roadside		100.0	49.3	50.6	47.3	33.2	35.4
DT59	295191	92395	Roadside		100.0	19.7	24.5	20.4	14.8	16.0
DT60	295466	92365	Roadside		100.0	35.8	37.0	30.7	23.5	26.8
DT61	295636	92232	Roadside		100.0	23.3	24.2	21.8	15.5	19.2
DT62	295710	90571	Roadside		90.4	20.2	19.2	16.3	11.5	14.7
DT63	294694	90001	Roadside		100.0	25.0	27.0	25.4	18.1	20.7
DT64	294652	89974	Roadside		100.0	19.9	22.6	20.6	17.8	16.9
DT65	296415	88477	Kerbside		100.0	26.9	27.9	24.4	17.2	22.1
DT66	294227	90435	Roadside		100.0	35.4	39.7	36.4	25.0	30.0
DT67	293213	91245	Roadside		100.0	23.4	25.6	21.5	15.9	19.1
DT68	292291	91678	Urban Background		90.4		13.7	13.8	9.4	11.7
DT69	291016	91304	Urban Background		84.6		11.5	11.2	7.6	9.3
DT70	291298	92593	Urban Background		90.4		17.5	16.1	12.3	15.9

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
DT71	294387	92611	Urban Background		73.1		11.2	10.5	7.6	9.1
DT72	293617	93090	Roadside		100.0			14.2	10.6	12.2
DT73	293052	94185	Urban Background		92.3			10.2	7.5	8.3
DT74	292056	93043	Urban Background		65.4			11.4	8.3	10.7
DT75	291721	89727	Roadside		100.0			15.8	11.1	13.7
DT76	291555	90449	Urban Background		92.3			14.7	9.6	12.3
DT77	292553	93082	Kerbside		100.0			31.1	18.6	23.8
DT78	296415	94165	Other		100.0			15.1	10.6	13.4
DT79	296827	93886	Roadside		84.6			19.5	14.5	17.3
DT80	295967	88876	Roadside		90.4			19.8	14.3	16.4
DT81	292637	91991	Roadside		100.0			15.6	11.2	13.9
DT82	292847	92911	Urban Background		100.0				10.8	12.6
DT83	291655	92258	Roadside		82.7				19.5	24.0
DT84	291897	92217	Roadside		100.0				15.5	18.6

☒ Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG16.

☒ Diffusion tube data has been bias adjusted.

☒ Reported concentrations are those at the location of the monitoring site (bias adjusted and annualised, as required), i.e. prior to any fall-off with distance correction.

Notes:

The annual mean concentrations are presented as $\mu\text{g}/\text{m}^3$.

Exceedances of the NO_2 annual mean objective of $40\mu\text{g}/\text{m}^3$ are shown in **bold**.

NO_2 annual means exceeding $60\mu\text{g}/\text{m}^3$, indicating a potential exceedance of the NO_2 1-hour mean objective are shown in **bold and underlined**.

Means for diffusion tubes have been corrected for bias. All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

Concentrations are those at the location of monitoring and not those following any fall-off with distance adjustment.

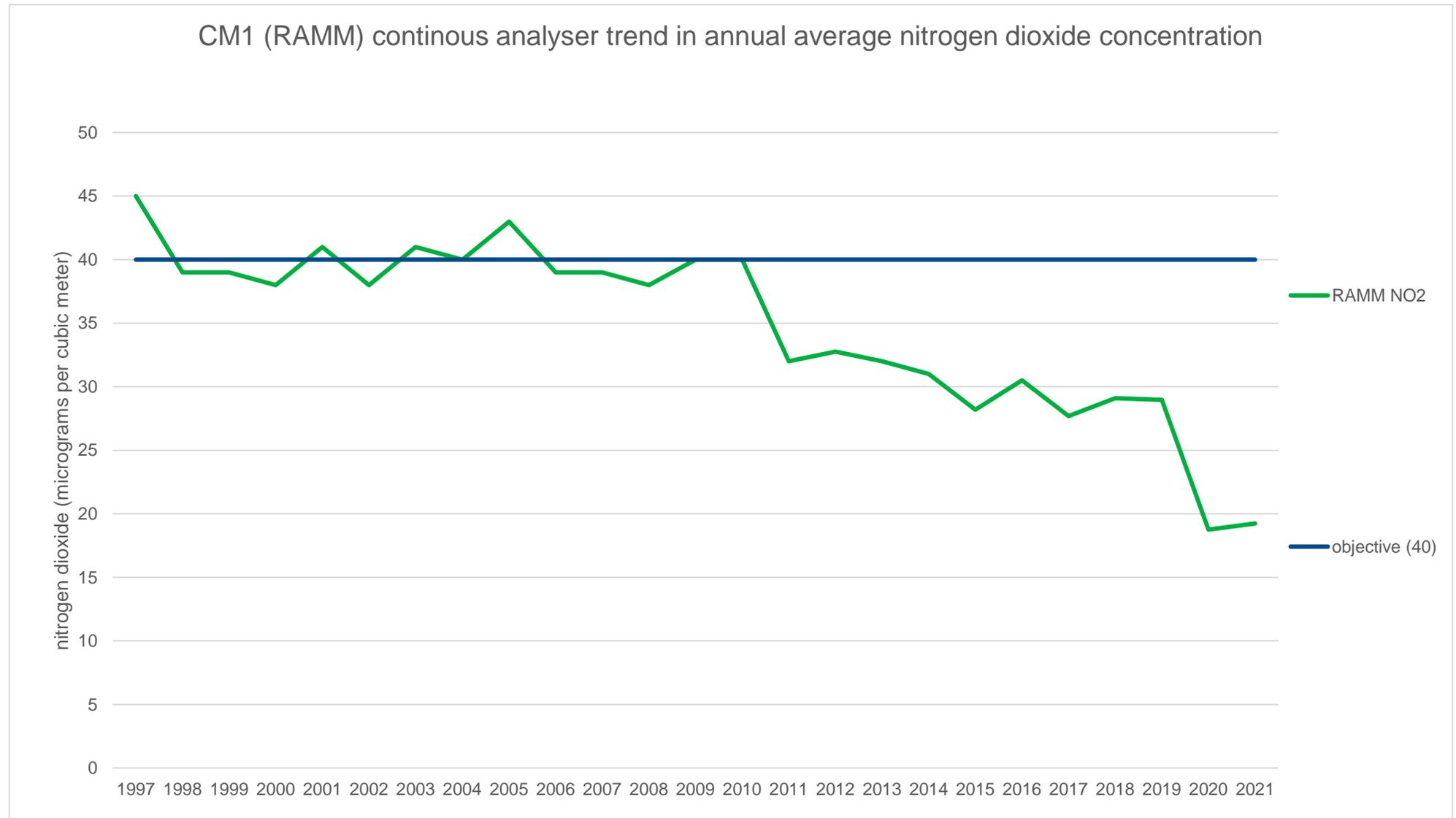
(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

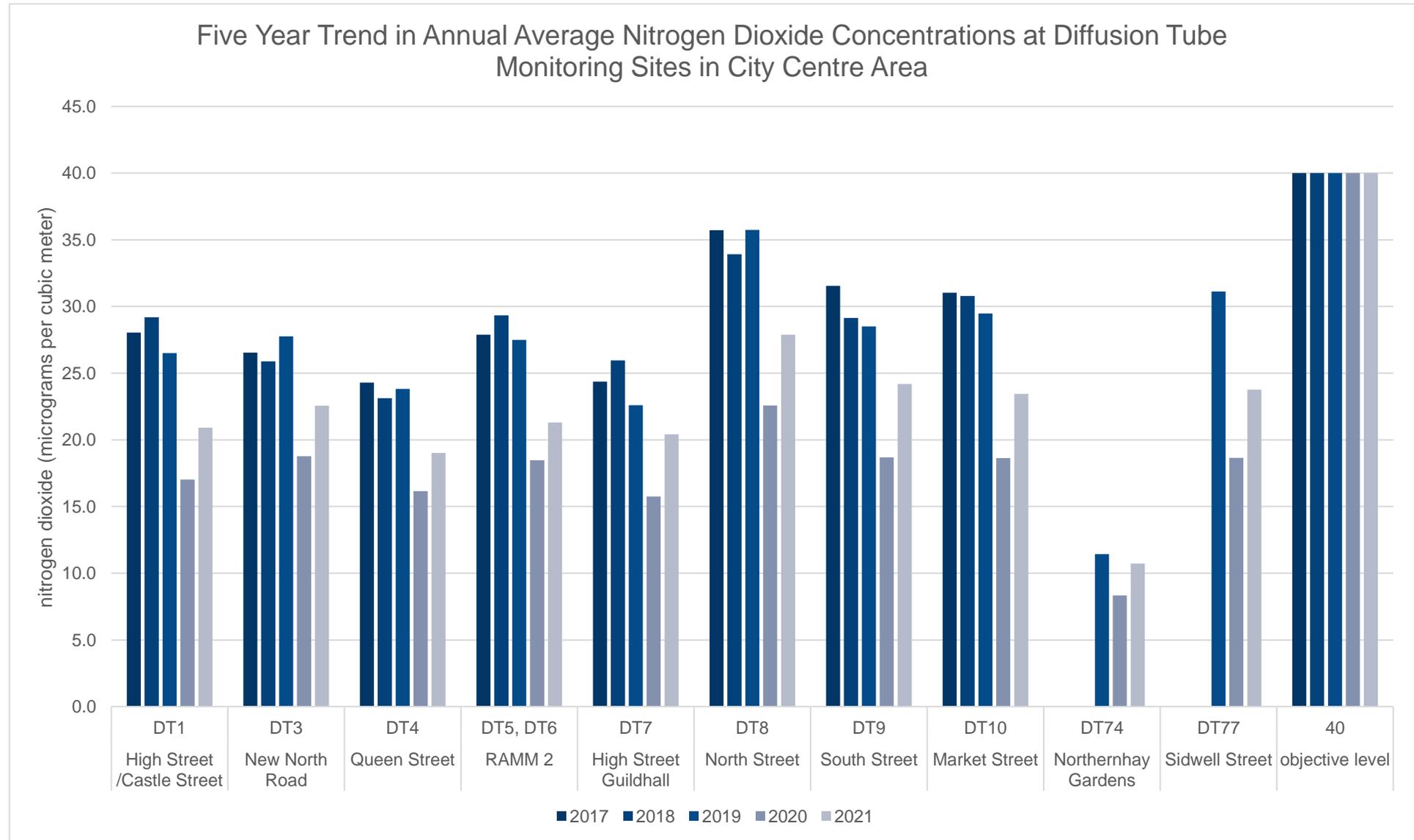
Figure A.1 – Trends in Annual Mean NO₂ Concentrations

The graphs below show the five year trends in annual average nitrogen dioxide concentrations at the RAMM continuous analyser and then each of the diffusion tube monitoring sites. The diffusion tubes sites are grouped roughly by geographic location. Each graph shows the objective level of 40 micrograms per cubic meter.

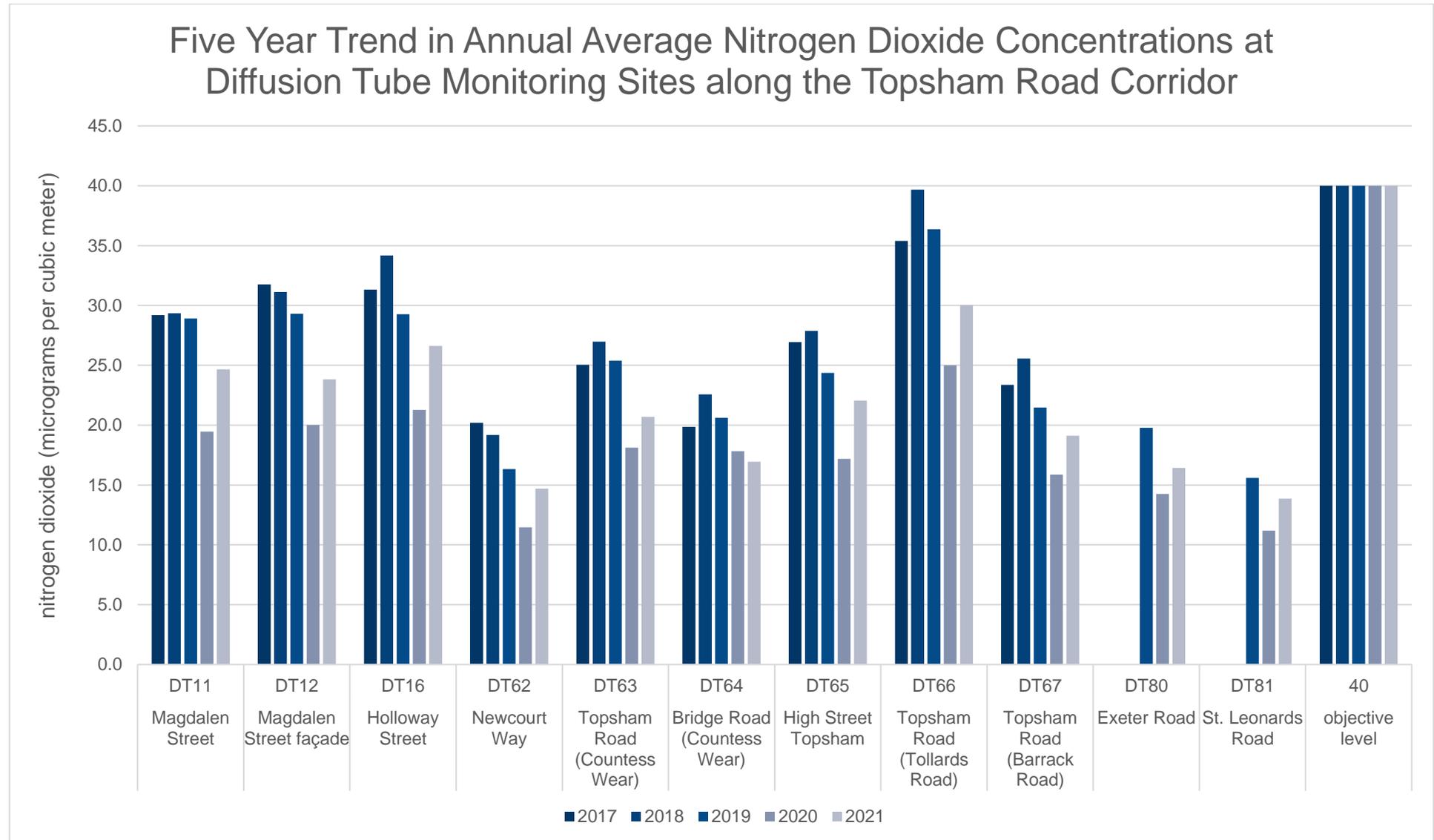
The first graph shows concentrations at the RAMM continuous analyser since monitoring commenced in 1997. Levels fluctuated around the objective of 40 micrograms per cubic meter until 2009, since when they have fallen below the objective.



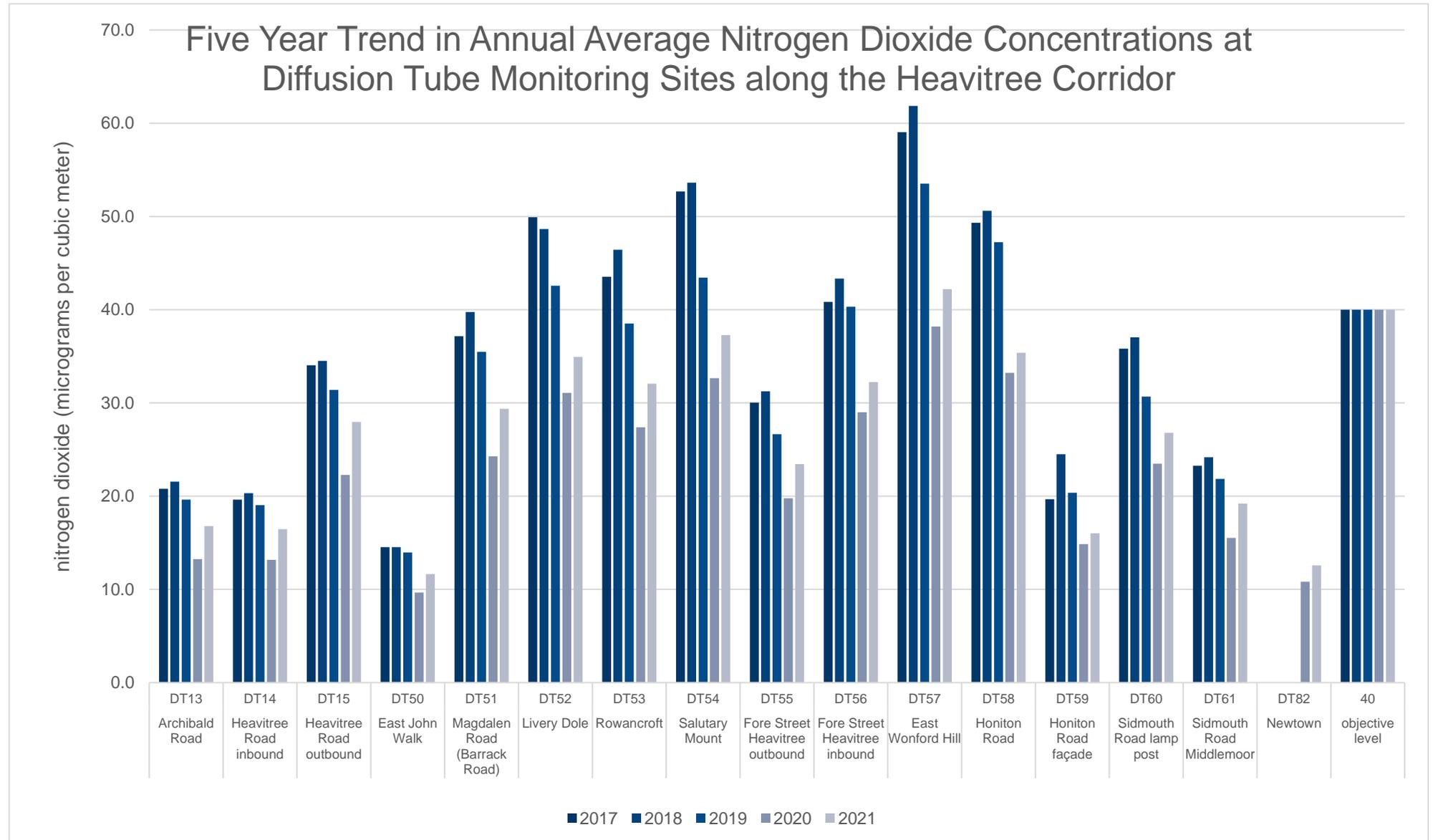
This graph shows the five year trend in concentrations at monitoring sites in the city centre. Concentrations fluctuated slightly between 2017 and 2019, with no long term trend. There was a significant fall in 2020 and then a rise in 2021 but not back to 2019 levels.



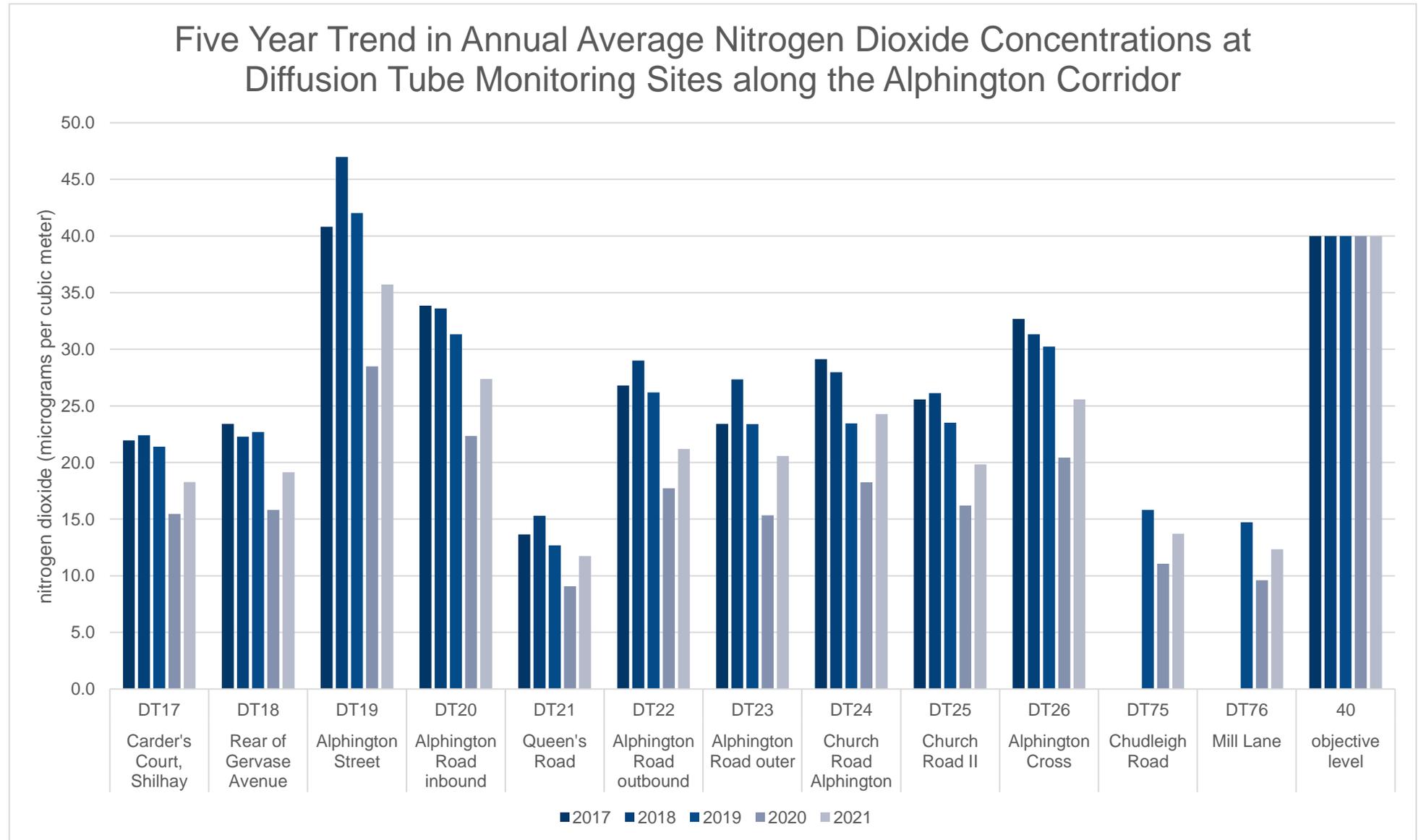
This graph shows the five year trend in concentrations at monitoring sites along the Topsham corridor. Concentrations fluctuated slightly between 2017 and 2019, with no clear long term trend. There was a significant fall in 2020 and then a rise in 2021 but not back to 2019 levels.



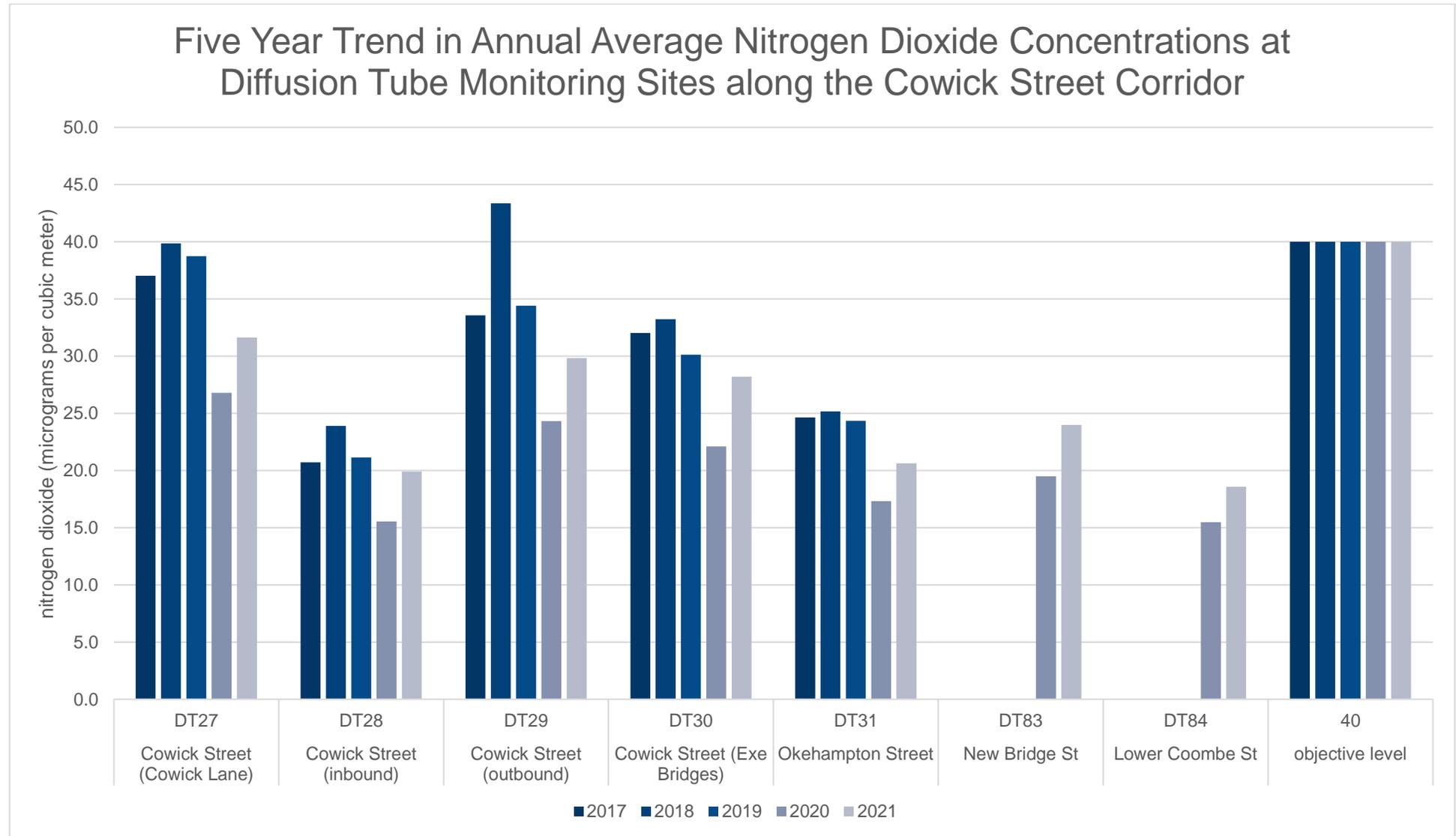
This graph shows the five year trend in concentrations at monitoring sites along the Heavitree corridor. Concentrations fluctuated slightly between 2017 and 2019, with no long term trend. There was a significant fall in 2020 and then a rise in 2021 but not back to 2019 levels.



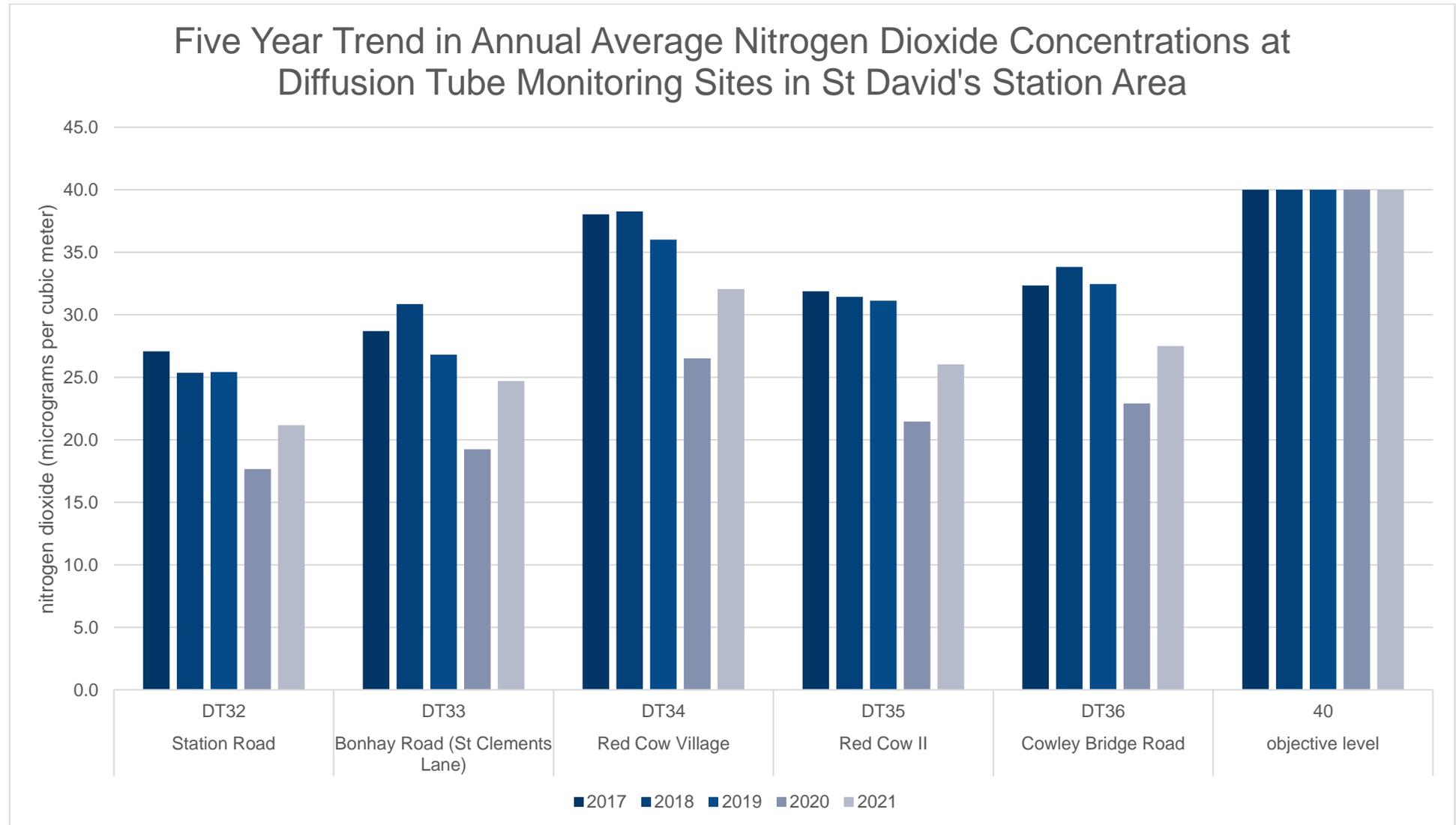
This graph shows the five year trend in concentrations at monitoring sites along the Alphington corridor. Concentrations fluctuated slightly between 2017 and 2019, with no long term trend. There was a significant fall in 2020 and then a rise in 2021 but not back to 2019 levels.



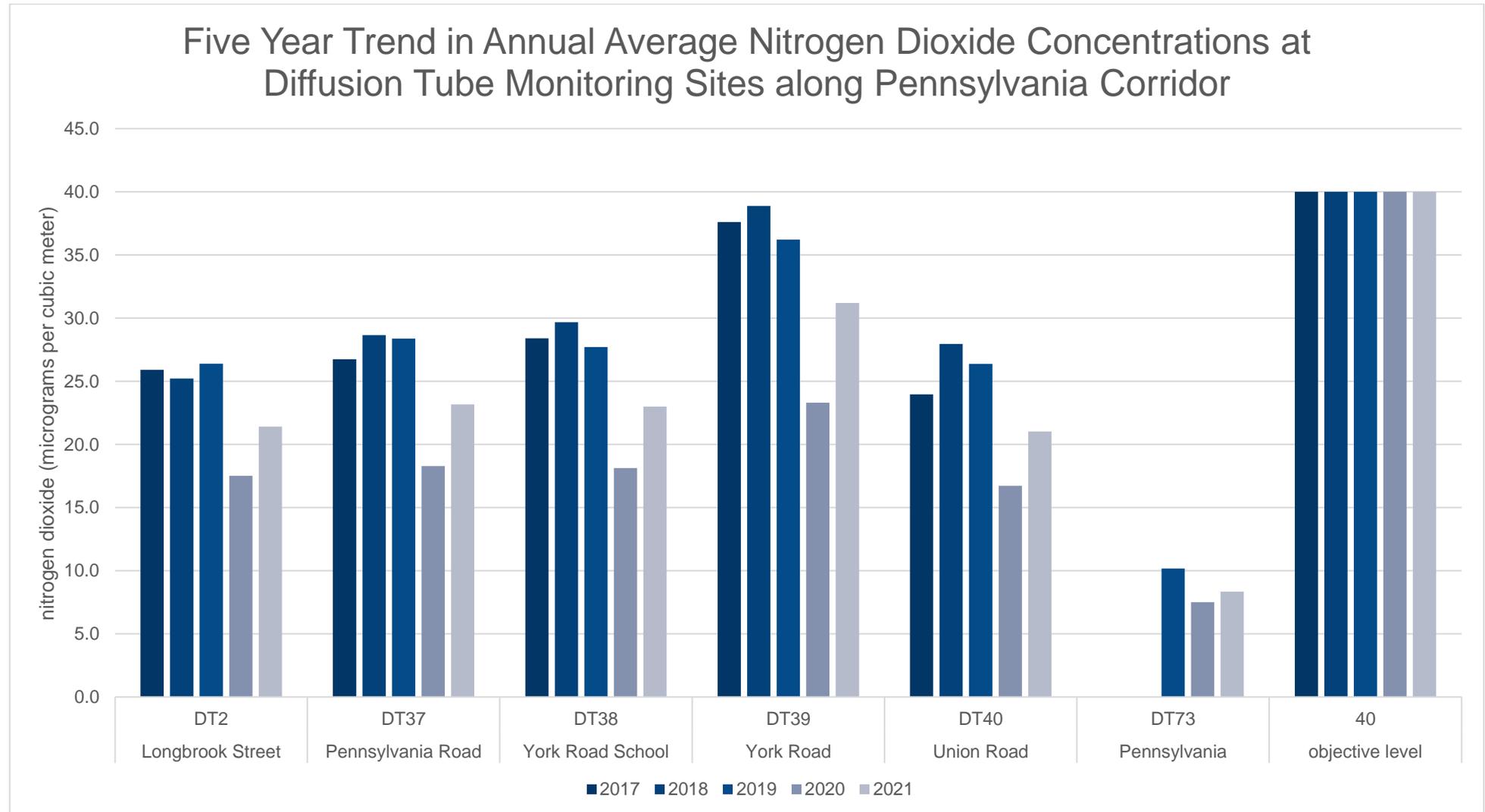
This graph shows the five year trend in concentrations at monitoring sites along the Cowick Street corridor. Concentrations fluctuated slightly between 2017 and 2019, with no long term trend. There was a significant fall in 2020 and then a rise in 2021 but not back to 2019 levels.



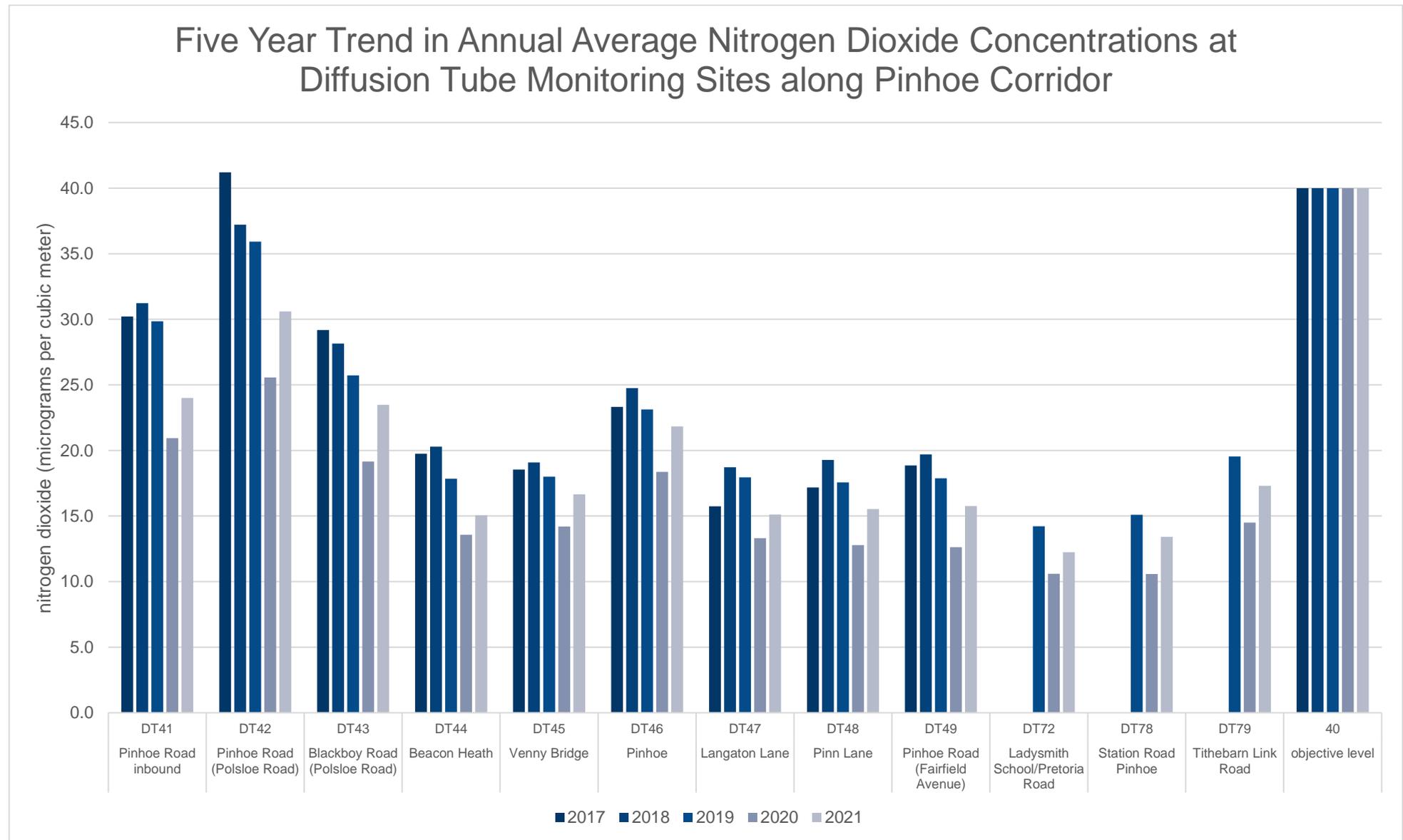
This graph shows the five year trend in concentrations at monitoring sites in the St Davids Station area. Concentrations fluctuated slightly between 2017 and 2019, with no long term trend. There was a significant fall in 2020 and then a rise in 2021 but not back to 2019 levels.



This graph shows the five year trend in concentrations at monitoring sites along the Pennsylvania corridor. Concentrations fluctuated slightly between 2017 and 2019, with no long term trend. There was a significant fall in 2020 and then a rise in 2021 but not back to 2019 levels.



This graph shows the five year trend in concentrations at monitoring sites along the Pinhoe corridor. Concentrations fluctuated slightly between 2017 and 2019, with no long term trend. There was a significant fall in 2020 and then a rise in 2021 but not back to 2019 levels.



This graph shows the five year trend in concentrations at monitoring sites in public open space. Concentrations fluctuated slightly between 2018 and 2019. There was a significant fall in 2020 and then a rise in 2021 but not back to 2019 levels.

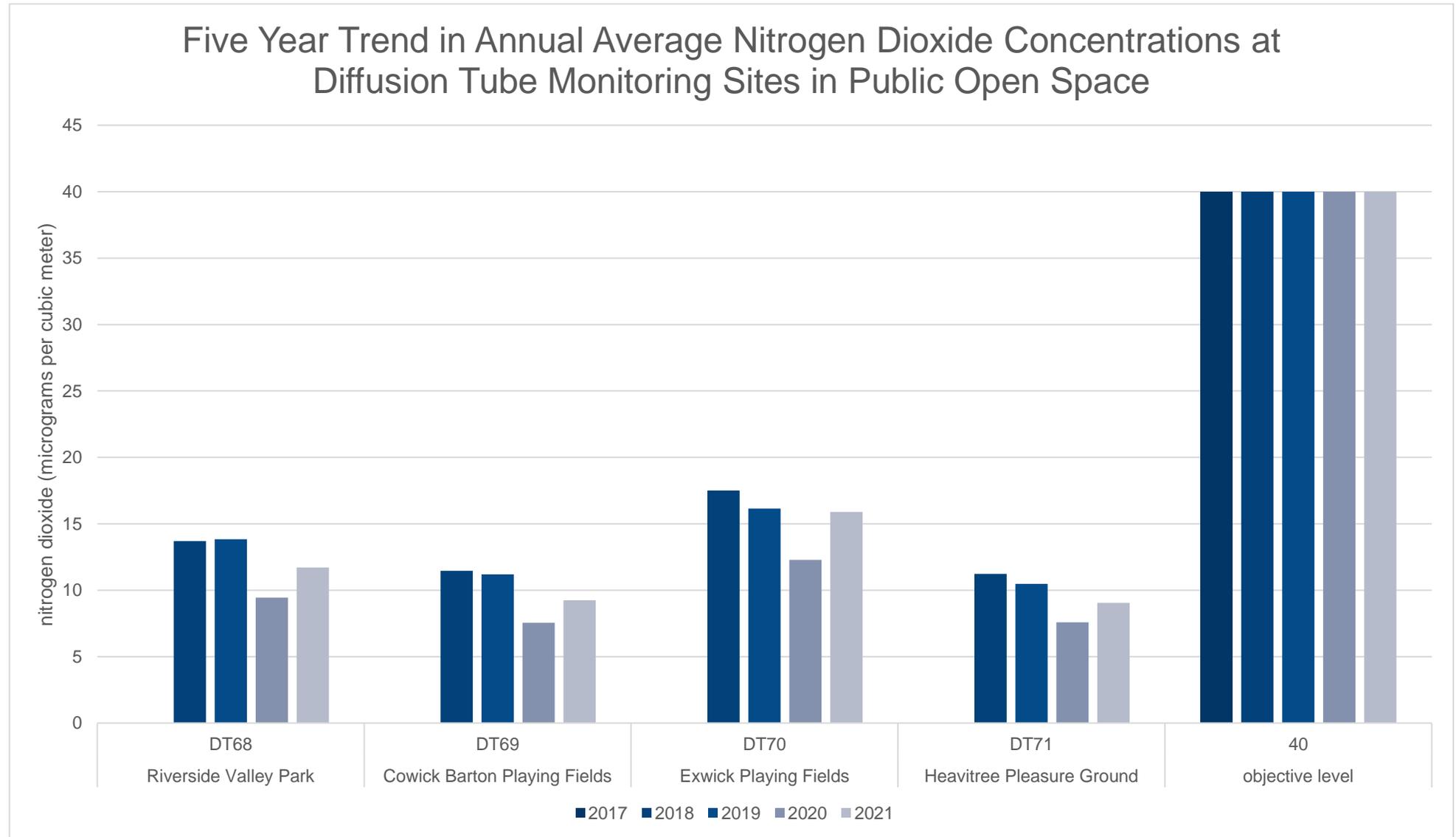


Table A.5 – 1-Hour Mean NO₂ Monitoring Results, Number of 1-Hour Means > 200µg/m³

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
CM1	291939	92830	Kerbside		99.1	0	0	0	0	0

Notes:

Results are presented as the number of 1-hour periods where concentrations greater than 200µg/m³ have been recorded.

Exceedances of the NO₂ 1-hour mean objective (200µg/m³ not to be exceeded more than 18 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 99.8th percentile of 1-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table A.6 – Annual Mean PM₁₀ Monitoring Results (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
CM1	291939	92830	Kerbside		99.7	18	17.7	15.8	14.1	13.9
CM2	291670	91773	Roadside		86.3	19	16.7	15.1	11.5	12.0

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG16.

Notes:

The annual mean concentrations are presented as µg/m³.

Exceedances of the PM₁₀ annual mean objective of 40µg/m³ are shown in **bold**.

All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Figure A.2 – Trends in Annual Mean PM₁₀ Concentrations

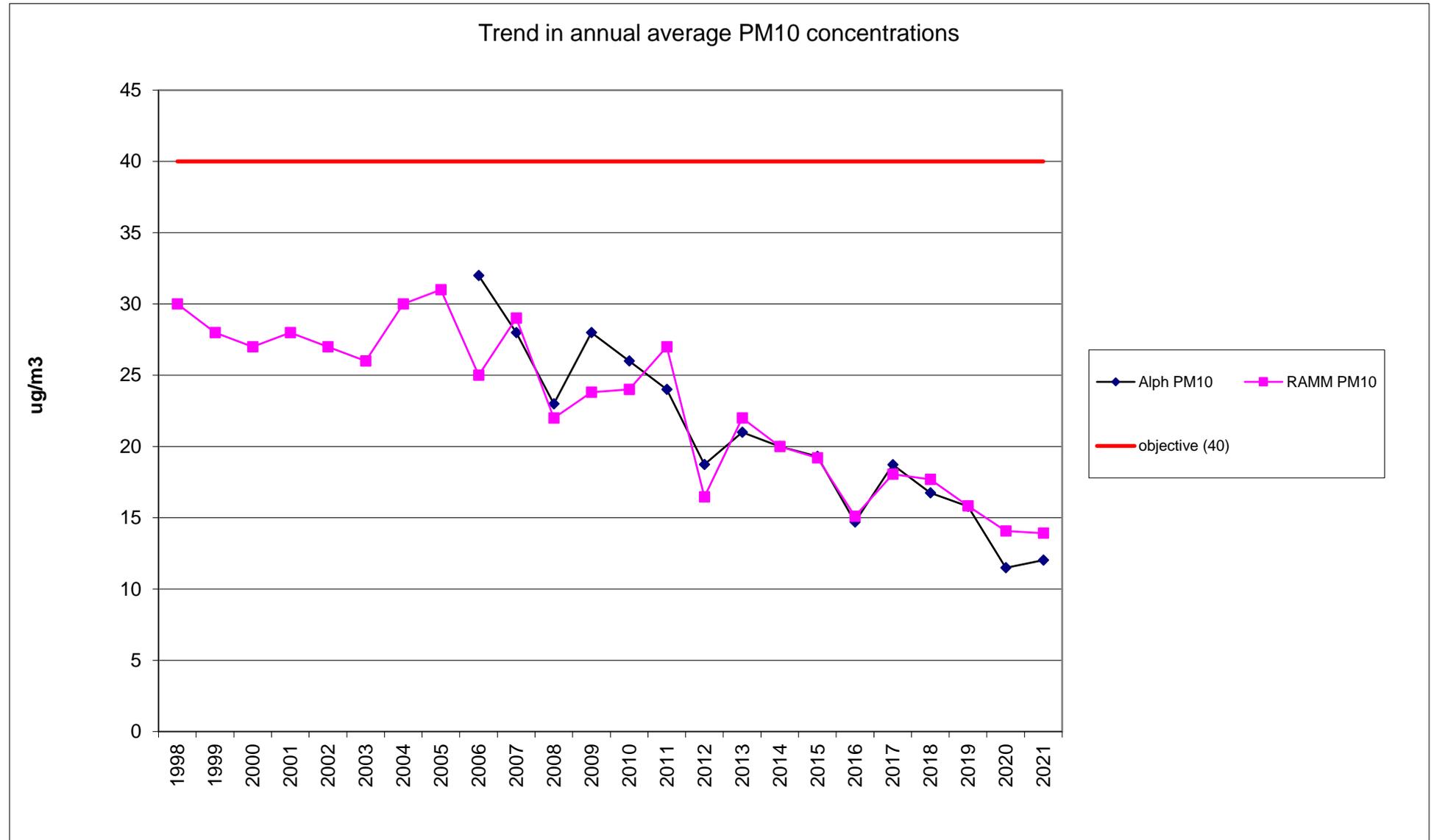


Table A.7 – 24-Hour Mean PM₁₀ Monitoring Results, Number of PM₁₀ 24-Hour Means > 50µg/m³

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
CM1	291939	92830	Kerbside		99.7	1	0 (28.8)	0 (21.2)	1	1
CM2	291670	91773	Roadside		86.3	2	1	4	0 (19.2)	0

Notes:

Results are presented as the number of 24-hour periods where daily mean concentrations greater than 50µg/m³ have been recorded.

Exceedances of the PM₁₀ 24-hour mean objective (50µg/m³ not to be exceeded more than 35 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 90.4th percentile of 24-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table A.8 – Annual Mean PM_{2.5} Monitoring Results (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017	2018	2019	2020	2021
CM1	291939	92830	Kerbside		99.7			10.0	8.6	8.4
CM2	291670	91773	Roadside		86.3		9.0	9.5	6.8	7.5

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG16.

Notes:

The annual mean concentrations are presented as µg/m³.

All means have been “annualised” as per LAQM.TG16 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Figure A.3 – Trends in Annual Mean PM_{2.5} Concentrations

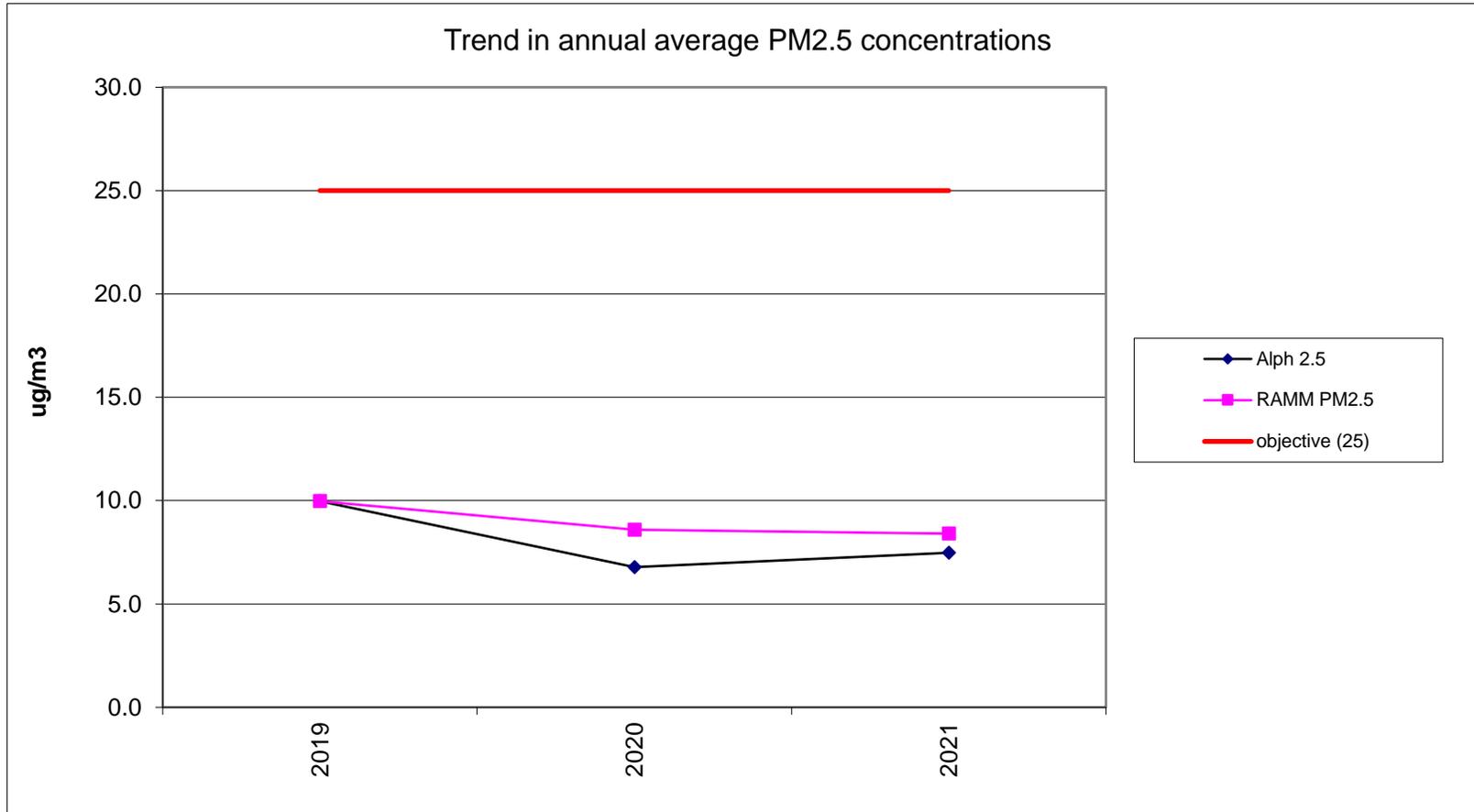


Table A.9 – O₃ 2021 Monitoring Results

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2021 (%) ⁽²⁾	2017 O ₃ 8-hour mean > 100 (µg/m ³)	2018 O ₃ 8-hour mean > 100 (µg/m ³)	2019 O ₃ 8-hour mean > 100 (µg/m ³)	2020 O ₃ 8-hour mean > 100 (µg/m ³)	2021 O ₃ 8-hour mean > 100 (µg/m ³)
CM1	291939	92830	Kerbside		98.5	0	12	11	87	0

Notes:

If the period of valid data is less than 85%, the 97th percentile of 8-hour running means is provided in brackets.

Appendix B: Full Monthly Diffusion Tube Results for 2021

Table B.1 – NO₂ 2021 Diffusion Tube Results (µg/m³)

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.84	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT1	292199	92814	29.7	29.3	26.9	27.0	22.3	19.2	20.9	18.4	23.0	24.5	29.4	28.3	24.9	20.9	-	
DT2	292315	93016	26.5	26.4	25.3		25.2	19.7	21.3	18.3	26.6	29.1	31.8	30.2	25.5	21.4	-	
DT3	292185	93049	26.6	25.0	27.7	24.1	28.2		21.4	21.3	26.4	29.7	35.1	29.6	26.9	22.6	-	
DT4	291779	93011	26.3	24.4	21.8	24.0	22.4	17.1	18.8	17.6	21.0	25.7	27.3	25.4	22.6	19.0	-	
DT5	291944	92826	27.4		24.5	26.8	22.5		22.1	23.1	27.1	27.3	32.3	22.0	-	-	-	Duplicate Site with DT5 and DT6 - Annual data provided for DT6 only
DT6	291944	92826	27.4		24.5	26.2			22.5	19.9	27.8	24.8	33.4	23.1	25.4	21.3	-	Duplicate Site with DT5 and DT6 - Annual data provided for DT6 only
DT7	291984	92626	24.6	28.4	25.5	25.1	23.5	18.9	20.0	20.9	24.1	27.5	29.1	24.0	24.3	20.4	-	
DT8	291895	92569	31.9	27.5	33.6	33.3	31.0	28.8	30.9	25.9	37.2	38.6	48.5	31.2	33.2	27.9	-	
DT9	291943	92511		24.3	26.3	26.9	27.4	25.0	28.1	23.3	30.0	33.2	39.9	32.3	28.8	24.2	-	
DT10	291833	92433	26.9	26.9	24.6	24.6	26.2	21.1	24.5	22.3	31.9	34.0	37.1	34.7	27.9	23.4	-	
DT11	292291	92292	29.9	26.4		28.0		22.0	26.4	22.2	32.4	31.0	41.1	34.1	29.4	24.7	-	
DT12	292422	92320	21.7	26.7	28.3	29.3	25.1	22.4	23.5	23.5	31.7	32.3	41.8	33.9	28.4	23.8	-	
DT13	292590	92743	23.7	21.5	19.0	19.9	17.2	14.2	15.7	15.3	21.8	23.4	25.2	23.0	20.0	16.8	-	
DT14	292832	92731	23.2	20.0	20.5	20.4	16.6	15.4	16.5	13.9	20.6	20.9	26.3	20.9	19.6	16.5	-	
DT15	292703	92807	32.5	33.3	32.4	40.1	28.6	28.4	32.4	27.4	39.4	31.7	39.7	33.4	33.3	28.0	-	
DT16	292378	92039	33.1	33.4	31.9	31.8	28.8	28.8	26.2	24.5	35.8	27.1	45.4	33.3	31.7	26.6	-	
DT17	291699	92091	25.9	20.4	23.6	23.2	21.2	16.5	18.4	17.4	21.6		30.5	20.6	21.8	18.3	-	
DT18	291657	91973	25.8	21.2	23.3	22.2	21.3	17.3	16.0	19.5	24.6	25.7	31.7	25.0	22.8	19.2	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.84	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT19	291669	91812	40.0	42.8	40.9	48.9	38.2	48.6	38.6	37.0	46.9	42.4	50.5	35.4	42.5	35.7	-	
DT20	291532	91349	35.0	30.9	32.5	33.8	29.5	29.6	30.5	26.4	33.3	34.6	42.2	32.8	32.6	27.4	-	
DT21	291460	91390	17.9	16.0	13.3	17.0	10.6	11.1	10.3	12.0	14.0	14.5	16.1	15.1	14.0	11.7	-	
DT22	291509	91151	26.2	30.4	25.1	34.1	19.8	25.3	27.4	22.2	16.6	28.2	30.5	17.1	25.2	21.2	-	
DT23	291518	90813	25.4	28.7	23.7	28.5	22.1	18.9	20.5	21.7	28.2	25.9	23.6	26.7	24.5	20.6	-	
DT24	291691	90425	31.5	27.8	29.6	28.4	30.9	25.3	26.2	24.6			34.5	30.0	28.9	24.3	-	
DT25	291767	90160	25.3	24.0	22.9	23.4	19.5	16.7	20.6	19.6	26.4	25.3	32.5	27.2	23.6	19.8	-	
DT26	291520	90531	33.1	27.9	30.8	29.4	31.6	25.8	27.7	24.9	31.5	33.3	40.4	28.8	30.4	25.6	-	
DT27	290864	91725	39.1	42.3	32.7	37.0	41.3	31.9	35.0	29.6	41.0	43.8	41.6	36.5	37.7	31.6	-	
DT28	291249	91874	25.5	23.1	23.4	27.7	18.5		19.7	20.7	23.3	25.7	28.3	24.6	23.7	19.9	-	
DT29	291376	91944	33.0	37.6	34.0	41.8	38.4	32.5	34.3	28.1	42.5	38.7	37.6	27.5	35.5	29.8	-	
DT30	291500	92055	33.9	28.6	34.2			28.4		29.0	36.3	35.0	45.4	31.5	33.6	28.2	-	
DT31	291351	92169	25.5	23.7	25.7	26.2	24.1	20.7	21.9	19.7	28.3	26.4	28.7	23.9	24.6	20.6	-	
DT32	290826	93598		26.9	22.1	24.2	27.4	22.6	23.0	13.9	29.9	29.6	31.0	26.5	25.2	21.2	-	
DT33	291253	93299	31.8	26.8	29.3	31.0	26.0	25.5	24.9	28.1	31.3	32.0	39.8	26.7	29.4	24.7	-	
DT34	291242	93483	38.7	33.5	38.8	36.1	37.7	38.1	33.0	32.7	40.7	44.7	47.4	36.6	38.2	32.1	-	
DT35	291272	93468	30.9	31.1	31.8	31.1	30.7	27.9	28.4	25.7	34.1	34.9	36.6	28.7	31.0	26.0	-	
DT36	291054	94399	34.9	36.6	31.4	27.9	33.5	27.5	27.4	23.0	37.7	40.6	39.0	33.4	32.7	27.5	-	
DT37	292391	93291	27.9	28.5	25.1	30.3	24.5	23.0	24.6	21.0	32.0	32.9	30.7	30.6	27.6	23.2	-	
DT38	292469	93245	29.9	29.3	27.3	28.5	23.6	23.6	21.9	22.5	29.7	28.6	34.1	29.4	27.4	23.0	-	
DT39	292579	93146	34.5	39.5	33.4	40.4	34.9		32.3	30.2	36.3	41.2	47.6	38.2	37.1	31.2	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.84	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT40	293047	93877	22.3	26.7	23.1	25.2	24.9		21.2	18.3	27.8	29.3	30.1	26.4	25.0	21.0	-	
DT41	293405	93395	33.0	32.4	28.5	27.0	31.8	23.3	25.2	20.2	31.2		33.2		28.6	24.0	-	
DT42	293251	93375	36.6	35.6	32.0	35.1	36.5	32.5	31.2	30.2	44.3	40.5	44.8	37.5	36.4	30.6	-	
DT43	293227	93356	33.8	26.9	30.8	25.4	27.8	23.7	23.4	21.7	28.3	29.7	36.5	27.5	28.0	23.5	-	
DT44	295068	94487	21.6	18.8	18.7	16.5	16.4	13.7	15.6	12.6	19.3	19.6	22.3	19.9	17.9	15.1	-	
DT45	295888	94101	23.4	20.2	19.0	19.1	18.2	15.8	16.7	15.0	21.0	21.8	25.4	22.3	19.8	16.6	-	
DT46	296418	94470	30.8	25.0	27.5	22.3	25.3	18.0	20.6	21.3	27.0	30.4	35.3	28.5	26.0	21.8	-	
DT47	296984	94327	20.3	24.4	16.7	19.3	17.0	13.1		13.7	18.7	18.0	18.1	18.6	18.0	15.1	-	
DT48	296494	93782	21.1	19.9	17.2	17.9	15.7	13.2	14.5	15.2	20.3	21.3	24.4	21.1	18.5	15.5	-	
DT49	295413	93689	23.3	20.4	19.9	19.9	15.6	14.6	13.7	15.2	19.4	19.0	24.4	20.0	18.8	15.8	-	
DT50	293091	92825	18.9	18.3	15.0	13.8	11.3	9.7	10.2	8.8	13.1	14.1	16.5	16.5	13.9	11.6	-	
DT51	293448	92419	38.2	43.1	34.7	38.1	33.3	31.7	29.1	28.0	39.0	34.2	38.3	32.0	35.0	29.4	-	
DT52	293418	92497	46.1	41.4		39.4	44.5	31.1	35.8	35.7	46.2	47.8	50.1	39.3	41.6	34.9	-	
DT53	293533	92473	40.3	41.2	38.7	38.3	39.1	30.8	31.1	29.5	41.8	42.6	49.7	34.8	38.2	32.1	-	
DT54	293738	92396	45.6	47.8	41.6	41.9	52.2	37.8	46.0	35.1	50.2	49.6		40.5	44.4	37.3	-	
DT55	293781	92409	32.1	32.1	29.7	28.4	24.4	23.5	22.0	22.7	29.0	29.5	33.3	28.0	27.9	23.4	-	
DT56	294043	92359	41.6	42.6	36.7	36.5	45.5	29.0	33.7	29.4	42.3	42.5	39.9	40.7	38.4	32.2	-	
DT57	294410	92310	52.9	48.5	48.0	49.8	59.6	40.0	43.1	40.2	61.7	60.2	53.4	45.4	50.2	42.2	-	
DT58	295203	92378	47.5	45.9	43.9	43.0	45.5	33.4	31.8	26.2	49.1	48.4	53.9	36.9	42.1	35.4	-	
DT59	295191	92395	23.3	22.5	20.8	20.6	15.0	12.8	14.9	13.5	21.2	20.7	23.1	20.2	19.1	16.0	-	
DT60	295466	92365	35.9	34.2	30.9	33.3	30.7	27.0	24.4	25.8	39.0	33.4	40.6	27.8	31.9	26.8	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.84	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT61	295636	92232	24.0	26.1	21.6	23.7	22.6	18.9	18.7	15.5	26.4	24.4	27.5	24.9	22.9	19.2	-	
DT62	295710	90571	19.7	17.9	17.0		15.8	14.1	14.6	13.7	20.3	18.0	23.7	17.6	17.5	14.7	-	
DT63	294694	90001	31.0	23.8	26.8	22.5	25.7	18.0	20.6	19.8	26.5	26.9	31.3	22.8	24.6	20.7	-	
DT64	294652	89974	22.6	18.3	21.6	22.3	18.6	16.9	16.4	17.6	19.9	22.0	27.2	18.6	20.2	16.9	-	
DT65	296415	88477	28.9	28.5	26.6	29.8	25.8	24.9	22.4	21.7	28.0	25.2	31.6	21.5	26.3	22.1	-	
DT66	294227	90435	36.1	37.9	35.3	34.3	37.3	33.2	33.1	29.1	42.0	41.4	41.4	27.7	35.7	30.0	-	
DT67	293213	91245	23.3	24.7	20.4	24.7	23.3	16.6	22.3	17.3	27.8	24.7	25.6	22.6	22.8	19.1	-	
DT68	292291	91678	17.1	17.4	13.8	15.4	11.9	9.5		9.0	13.2	16.0	15.2	15.0	13.9	11.7	-	
DT69	291016	91304	15.2	12.9		12.6	8.0	8.7	8.0	7.4	11.5	11.4		14.4	11.0	9.3	-	
DT70	291298	92593	21.3	17.2	18.7	21.1	16.2	14.4	14.6	21.8	19.7		24.3	18.9	18.9	15.9	-	
DT71	294387	92611	13.8	13.3	11.4			7.1		7.2	9.9	10.6	10.6	13.2	10.8	9.1	-	
DT72	293617	93090	18.9	16.4	15.9	13.6	12.8	9.4	10.8	9.0	14.2	16.9	19.7	17.2	14.6	12.2	-	
DT73	293052	94185	12.3	13.7	10.8	9.8	9.3	6.5	6.4	6.4	9.3	10.8		13.8	9.9	8.3	-	
DT74	292056	93043	16.5	14.6		12.3	11.7	7.7	9.1	8.8	12.7				11.7	10.7	-	
DT75	291721	89727	19.0	16.7	16.1	17.9	12.7	12.4	11.4	13.8	17.7	18.2	22.7	17.5	16.3	13.7	-	
DT76	291555	90449	18.3	16.3	16.2	16.0	12.8	11.8	12.1	10.9	16.0	15.2		16.1	14.7	12.3	-	
DT77	292553	93082	30.9	26.2	28.0	30.6	27.3	25.5	24.3	22.4	27.9	31.0	35.3	29.9	28.3	23.8	-	
DT78	296415	94165	18.0	17.4	16.6	16.0	13.5	12.4	13.3	11.7	18.1	16.6	20.1	18.1	16.0	13.4	-	
DT79	296827	93886			20.8	19.2	19.4	16.6	17.1	18.2	24.4	23.2	24.7	22.3	20.6	17.3	-	
DT80	295967	88876	23.8	19.2	20.8		18.9	16.4	16.6	13.2	21.1	20.4	26.2	18.5	19.6	16.4	-	
DT81	292637	91991	20.8	20.5	18.3	16.3	15.3	10.1	12.2	11.2	16.4	16.9	22.0	17.9	16.5	13.9	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Easting)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.84	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT82	292847	92911	19.1	17.0	16.3	14.3	14.1	8.8	11.0	10.9	11.3	17.2	20.0	19.6	15.0	12.6	-	
DT83	291655	92258	28.7	26.0	29.0	26.9	26.1	23.4		26.9	33.4	35.2		29.9	28.5	24.0	-	
DT84	291897	92217	23.4	19.0	24.0	24.6	19.4	17.0	18.9	19.7	22.0	22.6	32.6	22.4	22.1	18.6	-	

- All erroneous data has been removed from the NO₂ diffusion tube dataset presented in Table B.1.
- Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG16.
- Local bias adjustment factor used.
- National bias adjustment factor used.
- Where applicable, data has been distance corrected for relevant exposure in the final column.
- Exeter City Council confirm that all 2021 diffusion tube data has been uploaded to the Diffusion Tube Data Entry System.

Notes:

Exceedances of the NO₂ annual mean objective of 40µg/m³ are shown in **bold**.

NO₂ annual means exceeding 60µg/m³, indicating a potential exceedance of the NO₂ 1-hour mean objective are shown in **bold and underlined**.

See Appendix C for details on bias adjustment and annualisation.

Appendix C: Supporting Technical Information / Air Quality Monitoring Data QA/QC

New or Changed Sources Identified Within Exeter During 2021

Exeter City Council has not identified any new sources relating to air quality within the reporting year of 2021.

Additional Air Quality Works Undertaken by Exeter City Council During 2021

Exeter City Council has not completed any additional works within the reporting year of 2021.

QA/QC of Diffusion Tube Monitoring

Exeter City Council uses Gradko diffusion tubes (20% TEA in water). Gradko (GRADKO International Ltd., St. Martins House, 77 Wales Street, Winchester, Hants. SO23 0RH) laboratories hold UKAS accreditation, follow the procedures set out in the Harmonisation Practical Guidance and their performance was satisfactory in the centralised AIR NO₂ PT scheme for quality assurance and quality control.

The tube exposure period used generally follows the Diffusion Tube Monitoring Calendar provided by the Air Quality Support Helpdesk, i.e. an exposure time of 4 or 5 weeks, with an allowed variation in exposure time of ± 2 days. During 2021, the monitoring was completed in adherence with the 2021 Diffusion Tube Monitoring Calendar.

The tubes are stored in a fridge before they are exposed. Location sites and fixings follow the recommendations in the DEFRA practical guidance on the use of diffusion tubes for NO₂ monitoring, published in 2008. Two tubes are collocated with the continuous analyser at the Royal Albert Memorial Museum (RAMM), Queen Street (Exeter Roadside).

Data from the tubes are ratified and suspect data rejected by Exeter City Council, following the procedure in the DEFRA practical guidance. Random checks of the data in the reporting spreadsheet are also undertaken to ensure that no mistakes were made when

inputting the data. Analysis of the data from the two tubes that are co-located with the continuous analyser shows that these have overall good precision.

Diffusion Tube Annualisation

Data capture from the diffusion tube at Northernhay Gardens (DT74) was below 75% (67%) so this has been annualised using the LAQM Diffusion Tube Data Processing Tool. Annualisation factors were gained using data from nearby AURN sites Exeter Roadside, Honiton and Plymouth Centre. Details of the calculation method undertaken are provided in Table C.2.

Diffusion Tube Bias Adjustment Factors

The diffusion tube data presented within the 2021 ASR have been corrected for bias using an adjustment factor. Bias represents the overall tendency of the diffusion tubes to under or over-read relative to the reference chemiluminescence analyser. LAQM.TG16 provides guidance with regard to the application of a bias adjustment factor to correct diffusion tube monitoring. Triplicate co-location studies can be used to determine a local bias factor based on the comparison of diffusion tube results with data taken from NO_x/NO₂ continuous analysers. Alternatively, the national database of diffusion tube co-location surveys provides bias factors for the relevant laboratory and preparation method.

Exeter City Council have applied a national bias adjustment factor of 0.84 to the 2021 monitoring data. This means that the diffusion tubes over-estimate actual concentrations when compared to the reference method. The national bias adjustment factor was obtained from the spreadsheet version 03/22, for Gradko diffusion tubes (20% TEA in water) using 32 studies. This local bias adjustment factor was 0.76, derived from the two co-located diffusion tubes at the RAMM continuous analyser (CM1). Details of the calculation method undertaken are provided in Table C.3.

The national bias adjustment factor was chosen for use in this report because despite the co-located tubes at Exeter RAMM showing good overall precision, the data capture for each tube relatively low (83% and 75%). Choosing the national factor was considered to be the more conservative approach.

A summary of bias adjustment factors used by Exeter City Council over the past five years is presented in Table C.1.

Table C.1 – Bias Adjustment Factor

Monitoring Year	Local or National	If National, Version of National Spreadsheet	Adjustment Factor
2021	National	03/22	0.84
2020	Local	-	0.74
2019	Local	-	0.89
2018	National	03/19	0.93
2017	Local	-	0.85

NO₂ Fall-off with Distance from the Road

Wherever possible, monitoring locations are representative of exposure. However, where this is not possible, the NO₂ concentration at the nearest location relevant for exposure has been estimated using the Diffusion Tube Data Processing Tool/NO₂ fall-off with distance calculator available on the LAQM Support website. Where appropriate, non-automatic annual mean NO₂ concentrations corrected for distance are presented in Table B.1.

No diffusion tube NO₂ monitoring locations within Exeter City Council required distance correction during 2021.

QA/QC of Automatic Monitoring

Neither of the two PM analysers are part of the national network, however recommended QA/QC procedures from the AURN Local Site Operator's manual are followed. Horiba also service each analyser every six months.

Live PM10 and PM2.5 data is available at this [page](#).

The PM data is collected, validated and ratified by Exeter City Council. Validation involves checking the data daily for instrumentation errors etc. and then visually screening the data on a weekly basis to mark any obviously spurious or unusual measurements. The Council also undertakes data ratification on an approximately three monthly basis as well as following site services. This involves:

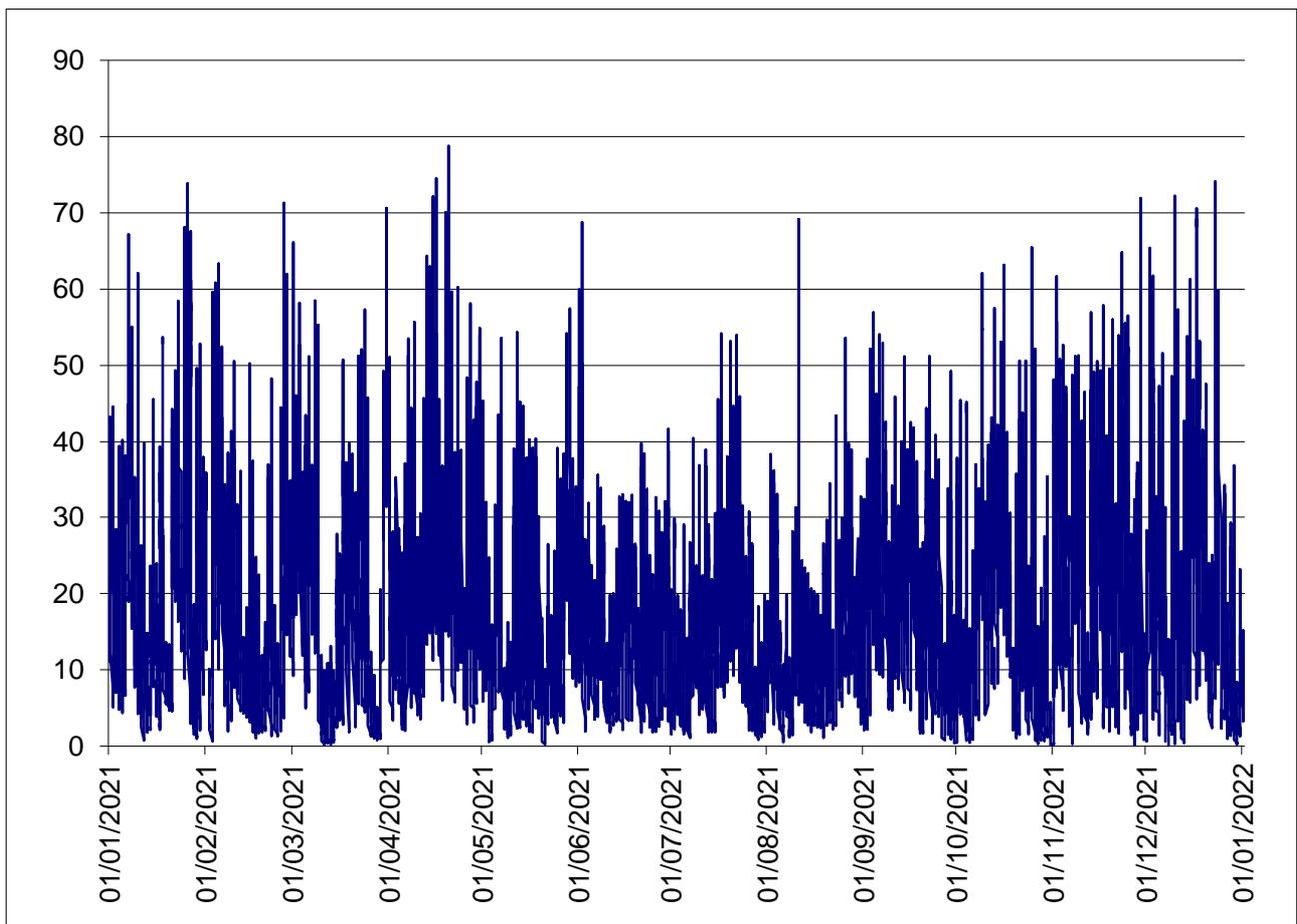
- Comparison of data with other pollutants and other appropriate AURN network sites (roadside sites and other sites in the south west),

- Final checking and deletion of data marked as possibly erroneous,
- Removal of data from unrepresentative periods of operation (e.g. road works in immediate vicinity of site etc. where data is shown or believed to have been affected),
- Adjustment for issues identified during services etc.

The NO₂ data from Exeter Roadside is collected and ratified by the AURN. Network data from the site can be found at [this link](#). It is ratified every 3 months by NETCEN, and is reported in the QA / QC Data Ratification Report for the Automatic Urban Network. Data capture from the NO₂ analyser was 99.1% in 2021.

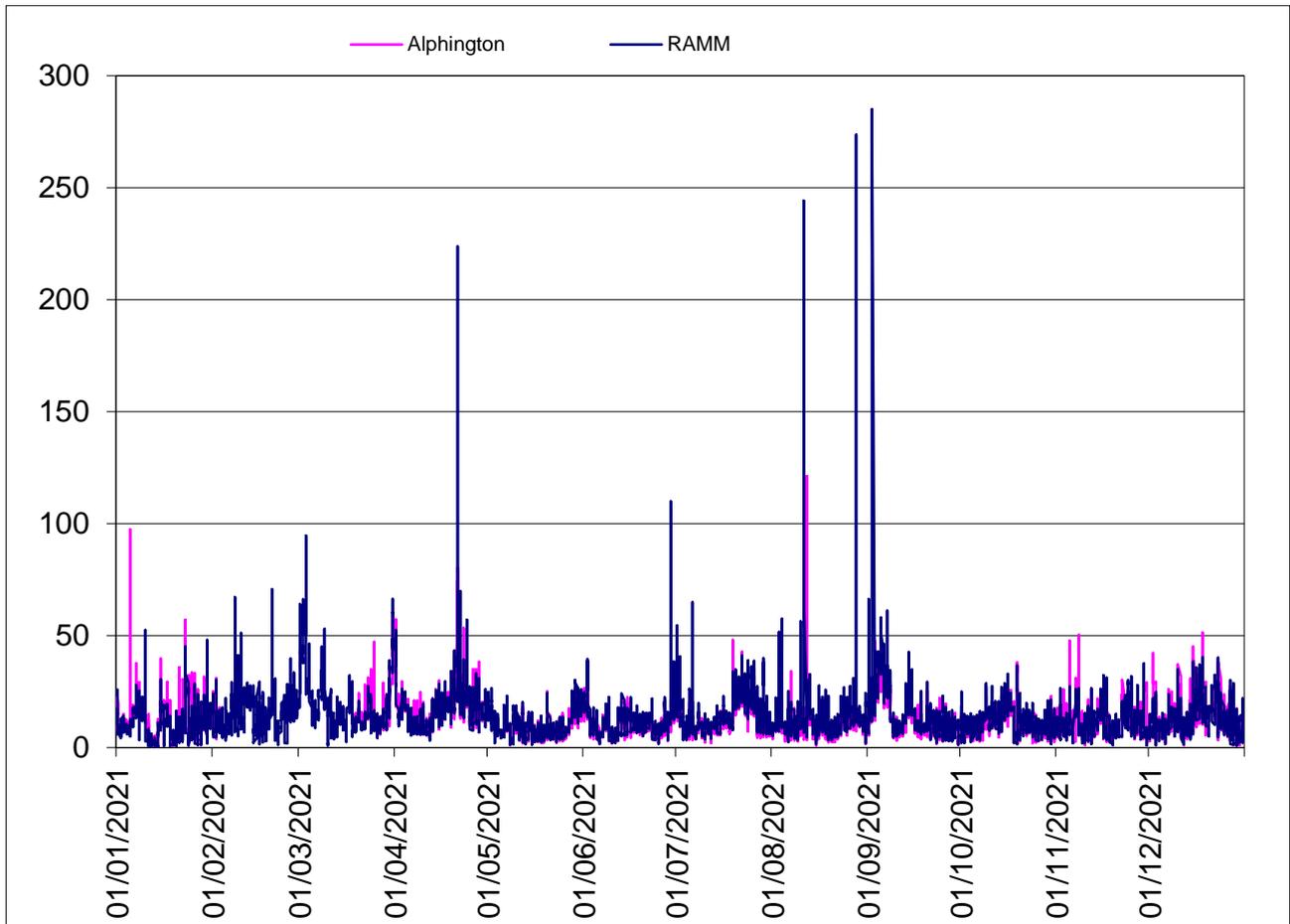
Plots of hourly average values for nitrogen dioxide, PM₁₀ and PM_{2.5} are shown below in figures C.1, C.2 and C.3.

Figure C.1 Hourly NO₂ data from Exeter Roadside (RAMM) (µg/m³)



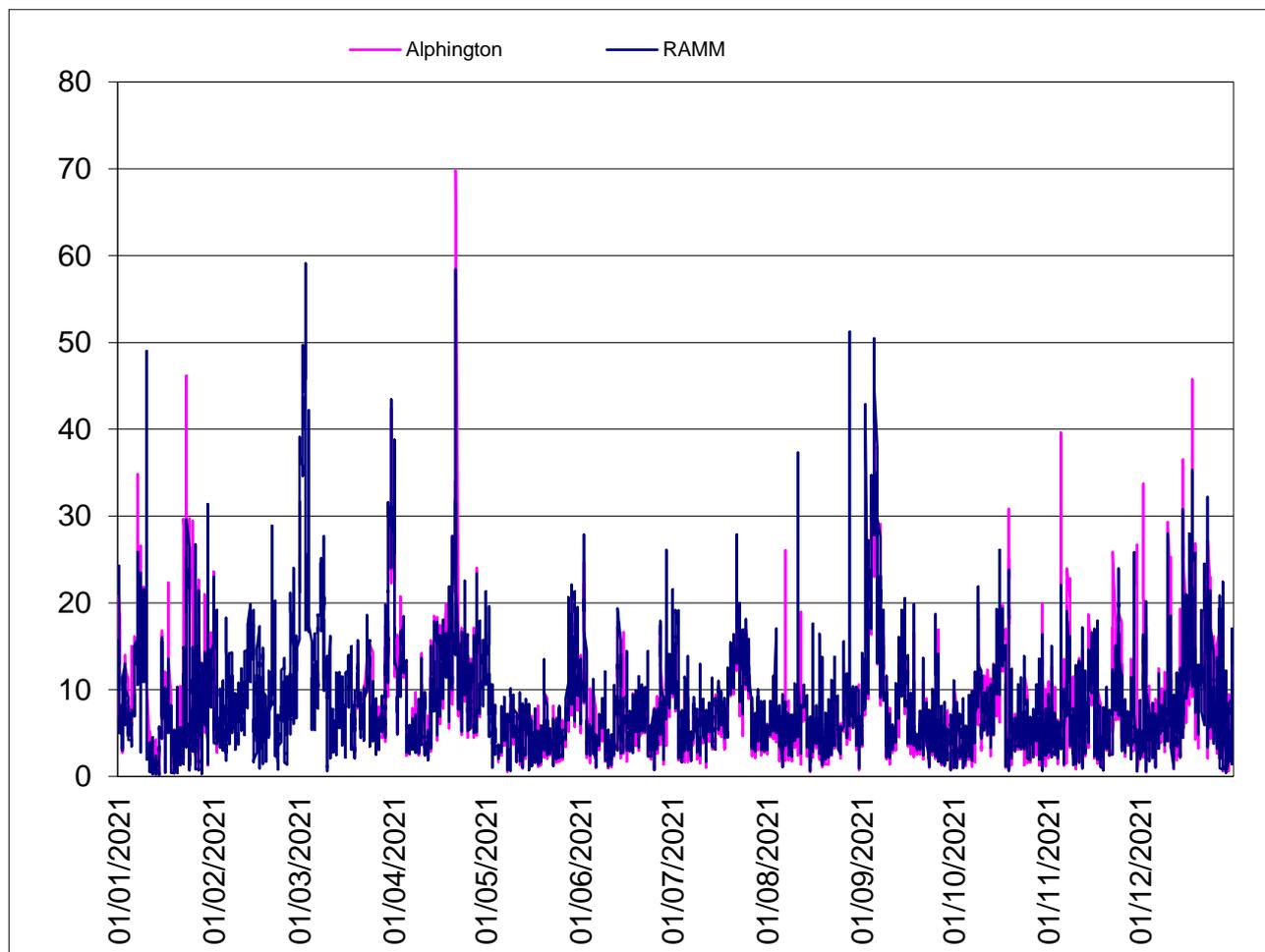
This graph shows the hourly NO₂ data from the RAMM continuous analyser.

Figure C.2 Hourly PM₁₀ data from Exeter Roadside (RAMM) and Alphington Street (µg/m³)



This graph shows the hourly PM₁₀ data from the RAMM and Alphington Street continuous analysers.

Figure C.3 Hourly PM_{2.5} data from Exeter Roadside (RAMM) and Alphington Street (µg/m³)



This graph shows the hourly PM_{2.5} data from the RAMM and Alphington Street continuous analysers.

PM₁₀ and PM_{2.5} Monitoring Adjustment

The type of PM₁₀/PM_{2.5} monitor(s) utilised within Exeter City Council do not require the application of a correction factor.

Automatic Monitoring Annualisation

All automatic monitoring locations within Exeter City Council recorded data capture of greater than 75% therefore it was not required to annualise any monitoring data. In addition, any sites with a data capture below 25% do not require annualisation.

NO₂ Fall-off with Distance from the Road

Wherever possible, monitoring locations are representative of exposure. However, where this is not possible, the NO₂ concentration at the nearest location relevant for exposure has been estimated using the NO₂ fall-off with distance calculator available on the LAQM Support website. Where appropriate, non-automatic annual mean NO₂ concentrations corrected for distance are presented in Table B.1.

No automatic NO₂ monitoring locations within Exeter City Council required distance correction during 2021.

Table C.2 – Annualisation Summary (concentrations presented in $\mu\text{g}/\text{m}^3$)

Site ID	Annualisation Factor Exeter Roadside	Annualisation Factor Honiton	Annualisation Factor Plymouth Centre	Annualisation Factor Site 4 N/A	Average Annualisation Factor	Raw Data Annual Mean	Annualised Annual Mean	Comments
DT74	1.0329	1.0849	1.1635	-	1.0938	11.7	12.8	

Table C.3 – Local Bias Adjustment Calculation

	Local Bias Adjustment Input 1	Local Bias Adjustment Input 2	Local Bias Adjustment Input 3	Local Bias Adjustment Input 4	Local Bias Adjustment Input 5
Periods used to calculate bias	9	-	-	-	-
Bias Factor A	0.76 (0.71 - 0.82)	-	-	-	-
Bias Factor B	31% (21% - 41%)	-	-	-	-
Diffusion Tube Mean ($\mu\text{g}/\text{m}^3$)	25.7	-	-	-	-
Mean CV (Precision)	3.1%	-	-	-	-
Automatic Mean ($\mu\text{g}/\text{m}^3$)	19.6	-	-	-	-
Data Capture	99%	-	-	-	-
Adjusted Tube Mean ($\mu\text{g}/\text{m}^3$)	20 (18 - 21)	-	-	-	-

Notes:

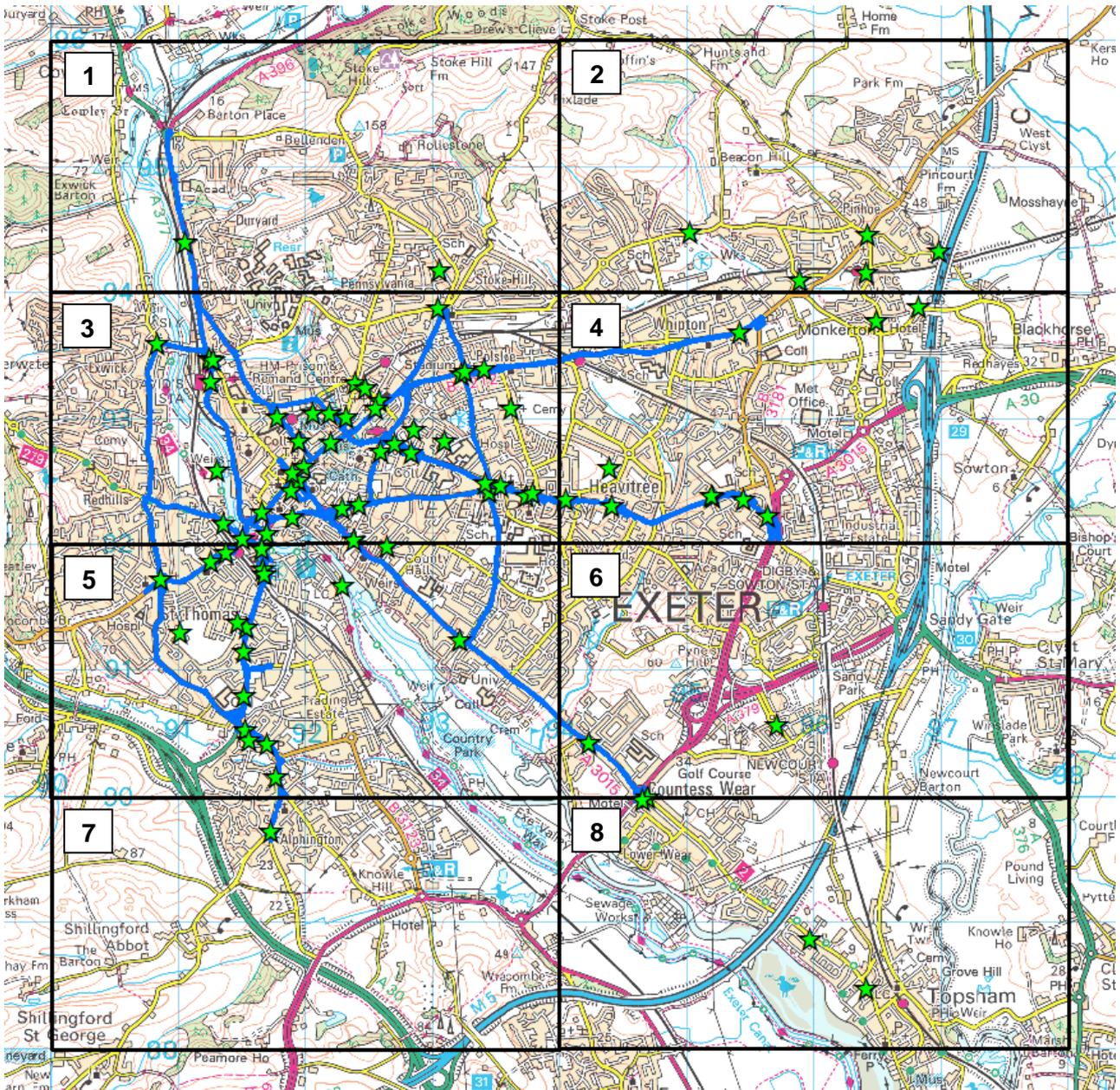
The national bias adjustment factor has been used to bias adjust the 2021 diffusion tube results.

Appendix D: Map(s) of Monitoring Locations and AQMAs

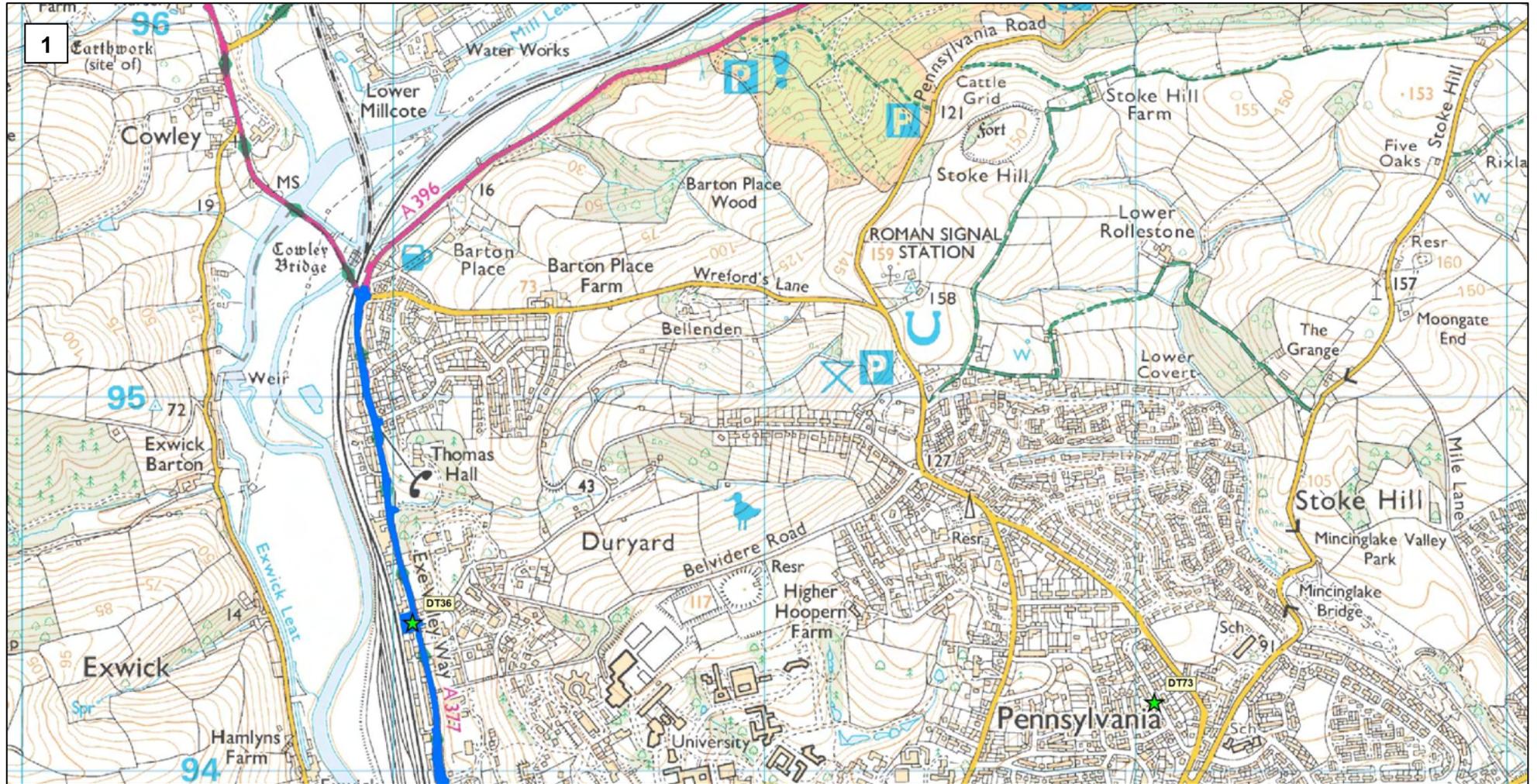
Figure D.1 – Map of Non-Automatic Monitoring Site

The monitoring locations and 2021 data can also be viewed using an online map [here](#).

Monitoring location = ★
AQMA =



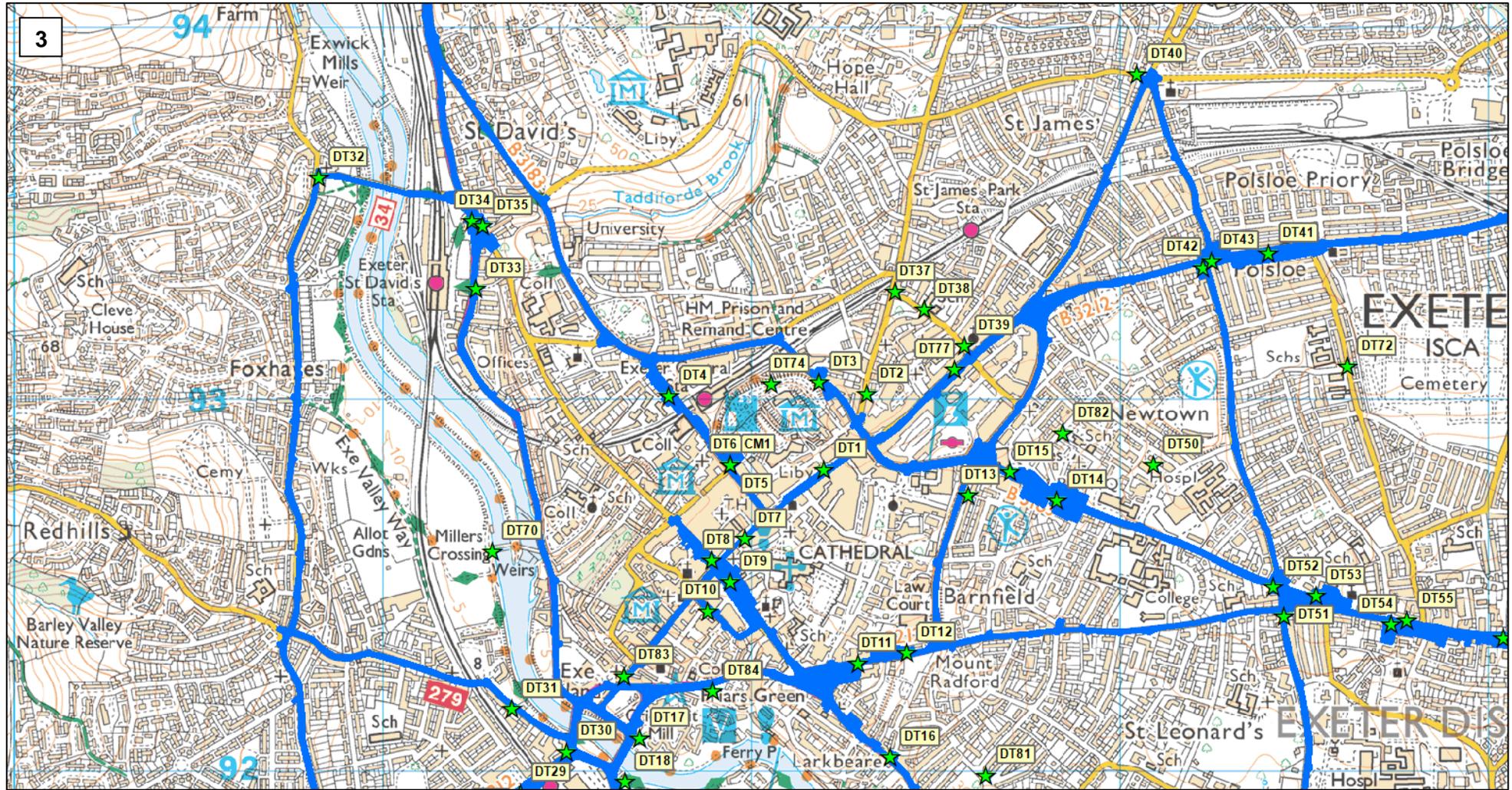
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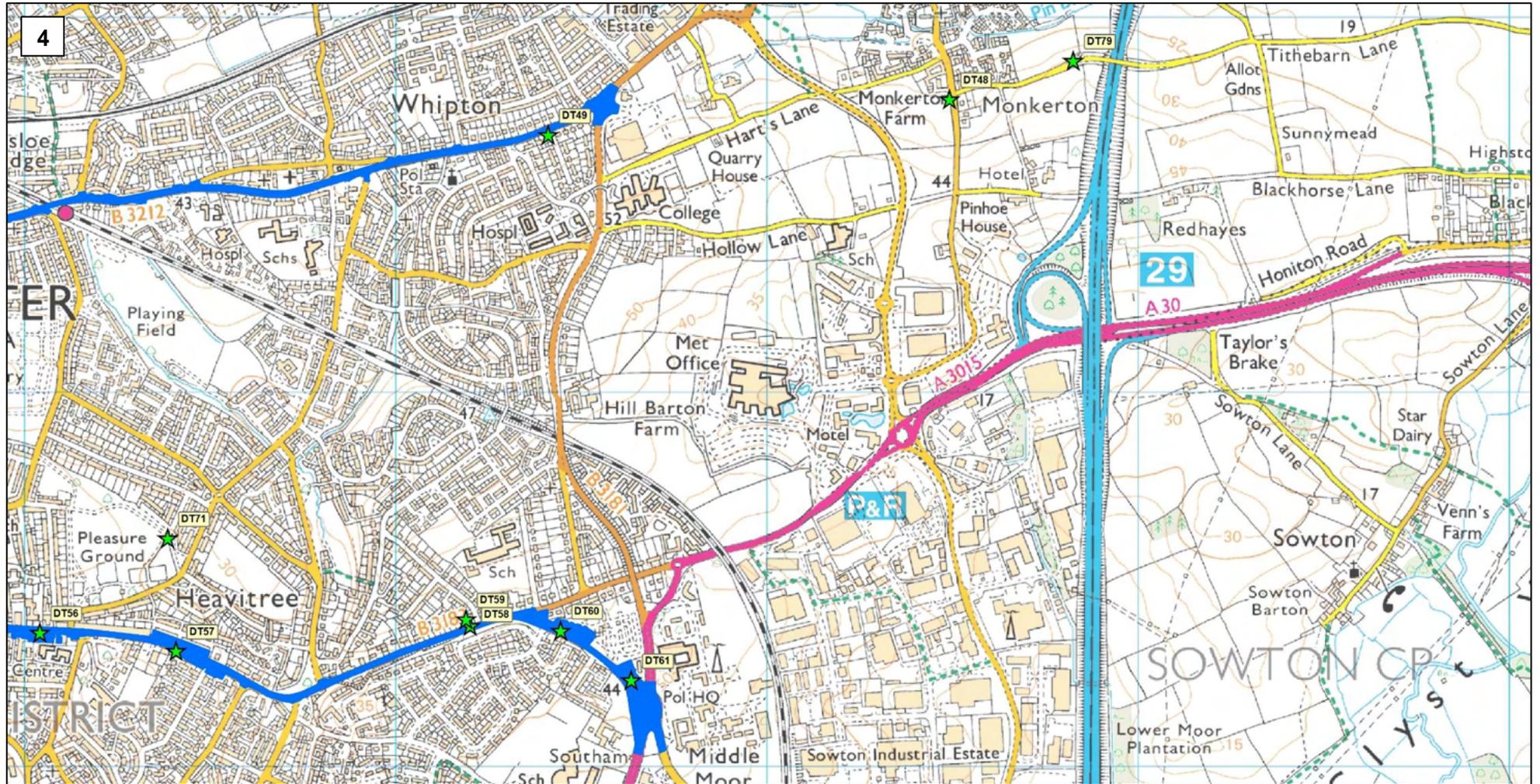
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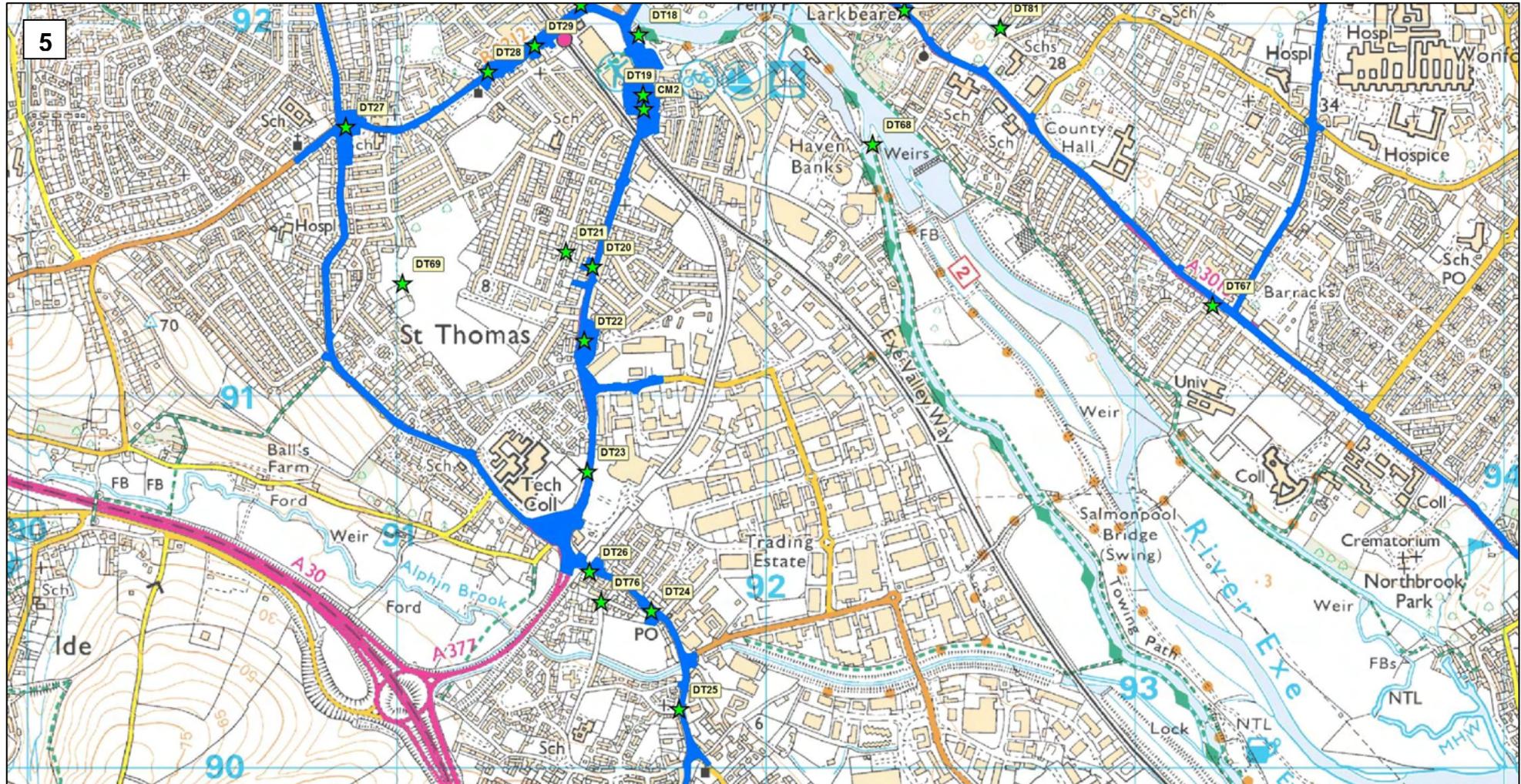
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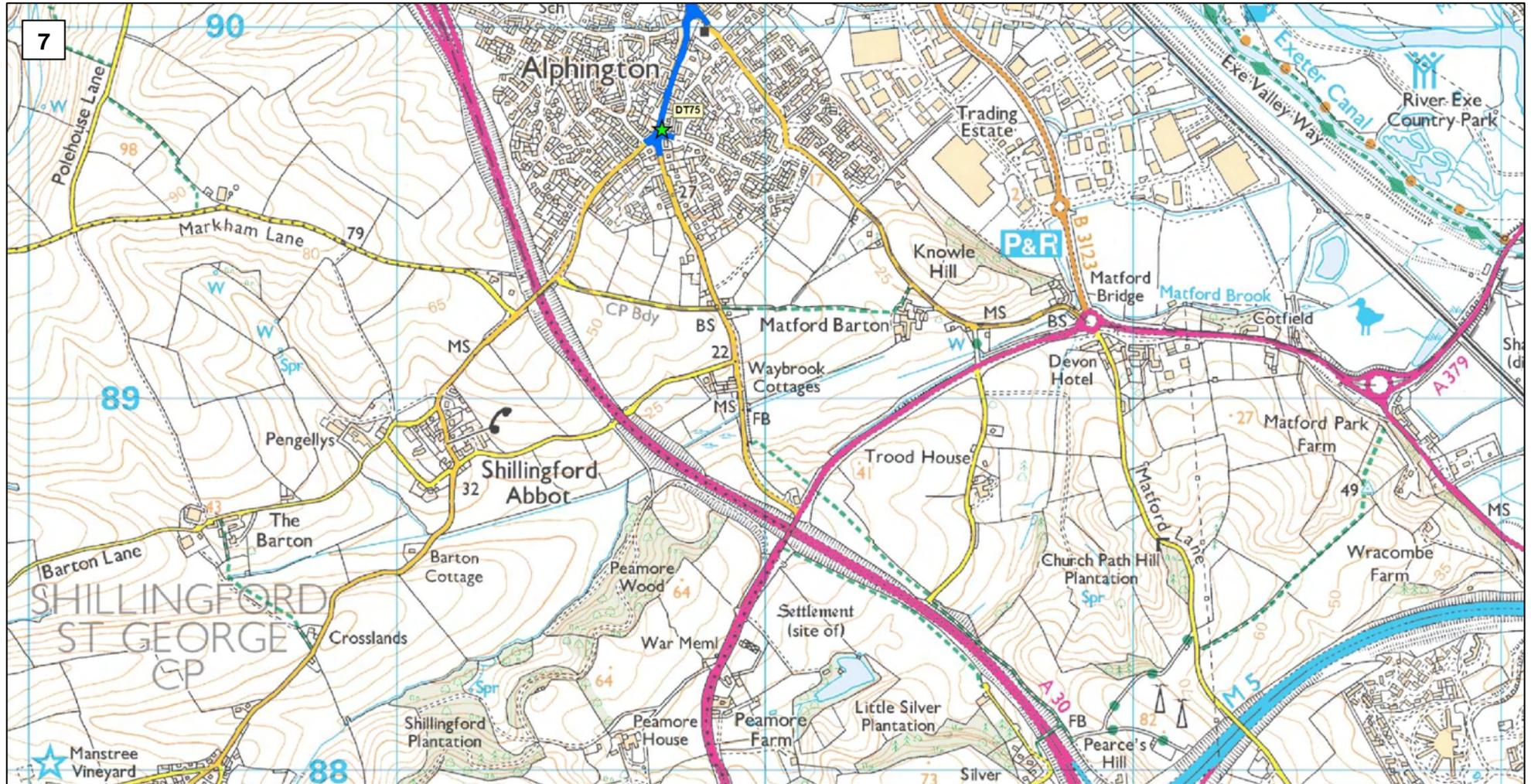
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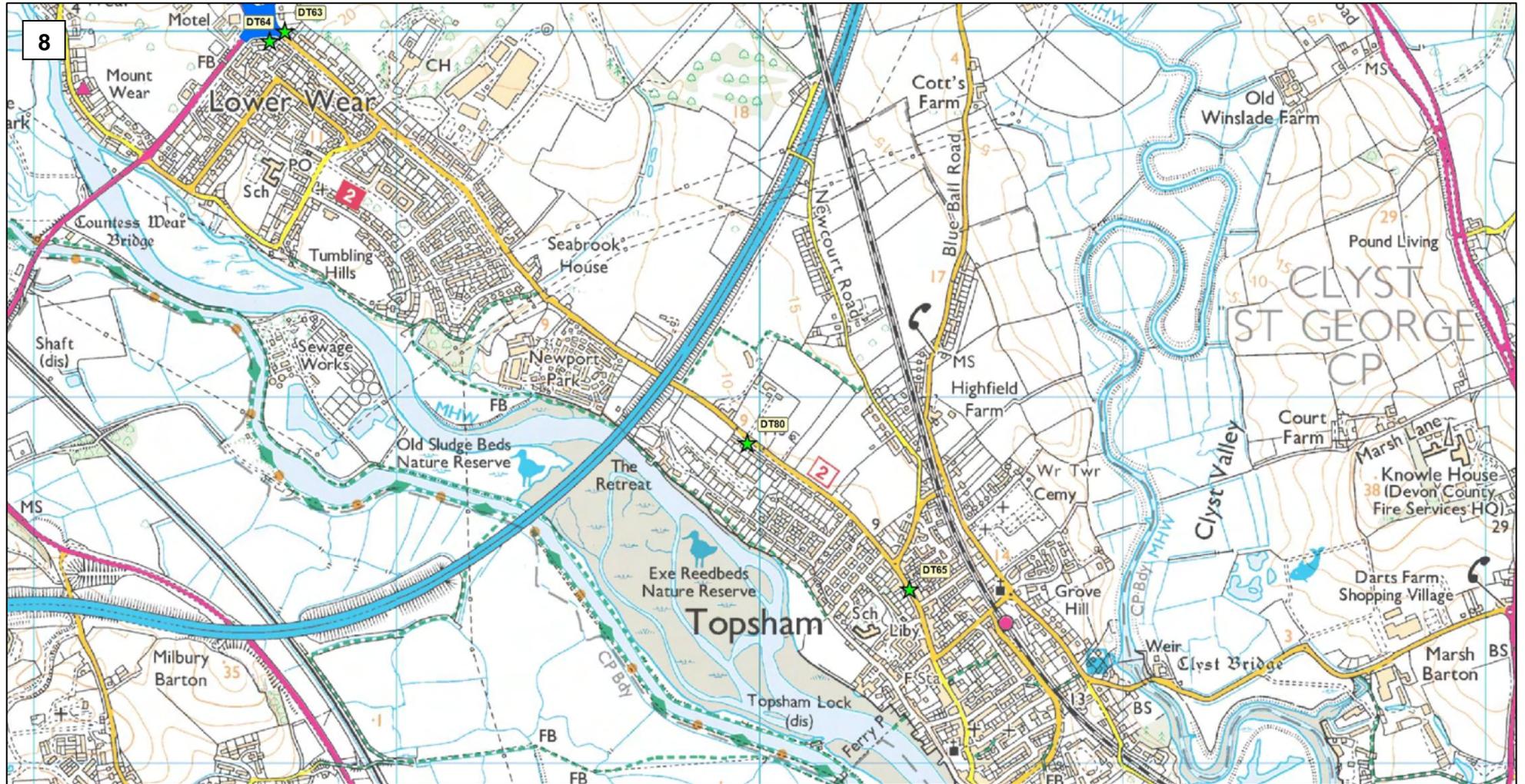
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Appendix E: Summary of Air Quality Objectives in England

Table E.1 – Air Quality Objectives in England⁷

Pollutant	Air Quality Objective: Concentration	Air Quality Objective: Measured as
Nitrogen Dioxide (NO ₂)	200µg/m ³ not to be exceeded more than 18 times a year	1-hour mean
Nitrogen Dioxide (NO ₂)	40µg/m ³	Annual mean
Particulate Matter (PM ₁₀)	50µg/m ³ , not to be exceeded more than 35 times a year	24-hour mean
Particulate Matter (PM ₁₀)	40µg/m ³	Annual mean
Sulphur Dioxide (SO ₂)	350µg/m ³ , not to be exceeded more than 24 times a year	1-hour mean
Sulphur Dioxide (SO ₂)	125µg/m ³ , not to be exceeded more than 3 times a year	24-hour mean
Sulphur Dioxide (SO ₂)	266µg/m ³ , not to be exceeded more than 35 times a year	15-minute mean

⁷ The units are in microgrammes of pollutant per cubic metre of air (µg/m³).

Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
ASR	Annual Status Report
Defra	Department for Environment, Food and Rural Affairs
DMRB	Design Manual for Roads and Bridges – Air quality screening tool produced by National Highways
EU	European Union
FDMS	Filter Dynamics Measurement System
LAQM	Local Air Quality Management
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
PM ₁₀	Airborne particulate matter with an aerodynamic diameter of 10µm or less
PM _{2.5}	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
QA/QC	Quality Assurance and Quality Control
SO ₂	Sulphur Dioxide
O ₃	Ozone
DCC	Devon County Council
ECC	Exeter City Council
GESP	Greater Exeter Strategic Plan
ECF	Exeter City Futures
SELDP	Sport England Local Delivery Pilot

References

- Local Air Quality Management Technical Guidance LAQM.TG16. April 2021. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Local Air Quality Management Policy Guidance LAQM.PG16. May 2016. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland.
- Exeter City Council 2019. Exeter Air Quality Action Plan 2019-2023.
- Exeter City Council 2019. Exeter Air Quality Annual Status Report.
- Diffusion Tubes for Ambient NO₂ Monitoring: Practical Guidance for Laboratories and Users 2008
- National bias adjustment factor spreadsheet.
- Devon Local Transport Plans.

Local Authority:	Exeter City Council
Reference:	ASR22-1257
Date of issue	July 2022

Annual Status Report Appraisal Report

The Annual Status Report sets out new information on air quality obtained by Exeter City Council as part of the Review & Assessment process required under the Environment Act 1995 (as amended by the Environment Act 2021) and subsequent Regulations.

Exeter City Council had two Air Quality Management Areas (AQMA) declared one for exceedances of the annual mean NO₂ objective and the other for the exceedance of the NO₂ hourly objective. NO₂ concentrations in the vicinity of the AQMA has seen a marginal downward trend over recent years.

During 2021 Exeter City Council conducted automatic monitoring of NO₂ at one location that was within the AQMA (CM1). There is also a second automatic monitor that only measures PM₁₀ and PM_{2.5} which is not located within the AQMA. Automatic monitoring site CM1 also monitored PM₁₀ and PM_{2.5}. Both sites had greater than 75% data capture for their monitored pollutants. There were no exceedances of any of the air quality objectives for any of the pollutants at any of the sites in 2021.

The Council undertook non-automatic (passive) monitoring of NO₂ at 83 locations, 50 of which are in AQMA. There were no changes to the monitoring network in 2021. The highest annual mean NO₂ concentration for 2021 was 42.2 µg/m³ at tube 57 which was exceeded the air quality objective. Nitrogen dioxide levels in Exeter in 2021 were slightly above those measured in 2020 but still show a noticeable reduction on pre-pandemic levels. No areas in the city are thought to exceed the objectives for particulate air pollution. Measured PM_{2.5} concentrations were well below the relevant objective level and PM₁₀ concentrations have shown a steady decline since 2006.

The Council has robust QA/QC procedures, which were applied appropriately and accurately to the 2021 monitoring data. The national bias adjustment figure (0.84) has been used this year as a result of low data capture at the co-located diffusion tube site. Data capture was generally good at all automatic monitoring sites during 2021 with data capture of more than 75%. Data capture from the diffusion tube at Northernhay Gardens (DT74) was below 75% (67%) so this has been annualised. The calculations were clearly outlined and justified. Distance correction was not required at any location.

Local Authority:	Exeter City Council
Reference:	ASR22-1257
Date of issue	July 2022

The current AQAP covers the period 2019-2024. The Council shall continue to improve air quality will continue to be focussed on those areas within the AQMA where exceedances have been measured. The priorities and challenges for 2022 are to implement the Physical Activity Strategy and Transport Strategy, to deliver the Local Cycling and Walking Implementation Plan and to deliver robust planning policy; all in the face of challenging and uncertain conditions.

On the basis of the evidence provided by the local authority the conclusions reached are acceptable for all sources and pollutants. The next step for Exeter City Council is to submit the next Annual Status Report, which is due to be submitted in 2023.

Local Authority:	Exeter City Council
Reference:	ASR22-1257
Date of issue	July 2022

Commentary

The report is well structured and provides all of the information specified in the Guidance. The report is accepted, and the following comments are to assist with future reporting.

1. The report has been completed to a high standard, with the accuracy of data presented and the discussion included with the report welcomed.
2. Robust and accurate QA/QC procedures were applied. Calculations for bias adjustment and annualisation factors were outlined in detail.
3. The Council has included discussion and review of its AQMAs and monitoring strategy, informed due to the monitoring network and also the AQAP measures. This demonstrates the Councils proactive approach to ensuring good air quality across the district.
4. Council have provided very clear and detailed maps of the diffusion tube monitoring network, this is welcomed. Trends are presented and discussed, and a robust comparison to air quality objectives is provided.
5. Overall, the report is detailed, concise and satisfies the criteria of relevant standards. The Council should continue their good and thorough work.

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority either in completing the Annual Status Report adequately (if required) or in carrying out future Review & Assessment work.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Government, Scottish Government or DOE.

For any other queries please contact the Local Air Quality Management Helpdesk:
 Telephone: 0800 0327 953
 Email: LAQMHelpdesk@bureauveritas.com

Local Authority:	Exeter City Council
Reference:	ASR22-1257
Date of issue	July 2022

Appraisal Response Comment Form

Contact Name:	
Contact Telephone number:	
Contact email address:	UKLAQMAppraisals@aecom.com

Comments on appraisal/Further information:

REPORT TO EXECUTIVE

Date of Meeting: 6 September 2022

REPORT TO COUNCIL

Date of Meeting: 18 October 2022

Report of: Director, Net Zero Exeter and City Management

Title: Northbrook Wild Arboretum: Project Initiation and Funding

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

The purpose of this report outline the stages to commence the development of the wild arboretum project and the funding required, as approved in principle by Executive in October 2021.

2. Recommendations:

2.1 That Executive approve in principle the stages required to develop the Northbrook Wild Arboretum in partnership with Devon Wildlife Trust; and RECOMMEND

2.2 RECOMMEND to Council the allocation of £288,583 in total towards the project made up of £222,615 from a mixture of the Community Infrastructure Levy funding or S106 if available, and contributions of £65,968 from partners.

3. Reasons for the recommendation:

3.1 In spring 2021 a public consultation overwhelmingly supported the concept that Northbrook Park should be developed to prioritise wildlife improvements and maintained as a peaceful and tranquil community space. The concept for the 'wild arboretum' achieved 96% support. The details of the consultation were reported in the Executive report of October 2021. This next stage report sets out the steps required to deliver the vision for this important green space.

3.2 The park provides a strategic green link between two of our most important green spaces and performs a critical function for the movement of wildlife. It represents a natural green infrastructure connection for people to move between parks and traffic free routes into the Quayside, Marsh Barton and the City Centre beyond.

4. What are the resource implications including non financial resources

4.1 Developing these proposals in further detail will require input from officers in both Exeter City Council Public and Green Spaces teams, our engineering team and from Devon Wild Life Trust.

4.2 Funding for the project is required from CIL and / or available S106. The notional amounts for the project have previously been discussed at the CIL Management Board and accounted for but this report seeks formal approval of the CIL contribution.

4.3 The headline funding breakdown is as follows:

Reason	Value
Project Delivery	£184,637
Committed sum for maintenance (4 years)	£103,946
Total	£288,583
Contributions	-£65,968
Total ask from CIL / S106	£222,615

A more detailed project breakdown is included in appendix 1.

5. Section 151 Officer comments:

5.1 The proposal is noted. The project, if approved will be added to the capital programme and the relevant amount of CIL (or section 106) will be ring-fenced for this purpose. The funding for maintenance will also be set aside. It is unclear from the report whether there will be an ongoing financial commitment for the Council at the end of the four-year period and Councillors should be aware that they may be adding in further, unfunded financial commitments for the future, which may result in reductions being required.

6. What are the legal aspects?

6.1 There will be an interim management agreement required between DWT and ECC for the development stages of the project. Once complete the park will be incorporated in the existing DWT lease for the valley parks on concurrent terms. This would seem to offer a simple solution to the management of the park.

7. Monitoring Officer's comments:

This report raises no issues for the Monitoring Officer. However, early contact should be made with Legal Services as the project progresses, so that work can progress on the interim management agreement in a timely fashion.

John Street (Deputy Monitoring Officer)

8. Report details:

8.1 The report 'Northbrook Park Proposal Delivery Update' is attached to this paper as appendix 1. It details the work completed since the last report, including the contributions and commitments from important partners such as DCC. It also sets out a phased approach for project delivery. These programmed phases tie in with the best times for

environmental work but they are not entirely consecutive and there is some overlap between them. The phases are:

8.2 Phase 1: Development: Partners agree the budget and outline project plan as well as management agreements. The project is developed in detail with other partners. An Interim Management Agreement is put in place (for at least four years), and the integration into the existing valley park lease are agreed.

8.3 Phase 2: Tactical delivery: Some smaller-scale tree planting and access works are agreed to generate community support and engagement. Includes a short-term agreement on use of the building for outreach activities.

8.4 Phase 3: Infrastructure delivery: Major access routes, paths, and other infrastructure improvements are delivered around the main park site.

8.5 Phase 4: Habitats delivery: Programme of habitat enhancements (involving local communities).

8.6 Phase 5: Management / ongoing development: This phase includes the transition from the initial capital project to DWT managing the site (under the Interim Agreement). Linked projects around the long term use of the building and the Northbrook stream will continue as separate strands.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The strategic location of Northbrook Approach means that enhancing the biodiversity and green infrastructure of the site contributes strongly to three of our key priorities in the Corporate Strategy and the principles contained within the vision for Liveable Exeter. They are:

9.2 Tackling Congestion and Accessibility. The potential for this site to link up existing green, traffic free travel routes, provides opportunities for people to move into the Quayside, Marsh Barton, the City Centre and the wider city. Making sustainable green travel options more attractive and accessible can only help to promote alternatives to car use.

9.3 Building Great Neighbourhoods. The quality of the local environment directly impacts the quality of life for our residents. Exeter has always ranked very highly as a great place to live and this site offers a great opportunity to further enhance our natural environment and open up the green space to greater public use.

9.4 Promoting Active and Healthy Lifestyles. The link that Northbrook provides between Riverside and Ludwell Valley Park provides a great opportunity to enhance walking and cycling infrastructure. The green link will open up the possibility of longer recreational walking and cycling routes and the enhancement of the greenspace will encourage more people to visit and enjoy it.

9.5 The importance of the Northbrook Approach and the links with Ludwell and Riverside Valley Parks must also be viewed in the context of the Liveable Exeter Garden Villages vision. The higher density development with a reduced reliance on the use of the private car means that the quality of our green spaces and the active and green travel links they

provide, gain even greater significance. Northbrook provides the strategic link to enable greater connectivity between our greenspaces.

9.6 Planting the right trees in the right place can also aid carbon sequestration and whilst there is an inevitable gap between planting and effective carbon absorption, planting for the future is still the right thing to do. The proposals will also increase and enhance the biodiversity of what is currently a pleasantly green but not particularly ecologically rich site.

10. What risks are there and how can they be reduced?

There are no significant risks to this proposal providing that the funding can be allocated to deliver the proposals.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act.

12. Carbon Footprint (Environmental) Implications:

12.1 The proposals to enhance Northbrook Park have been warmly supported by those who took part in the consultation. Should those proposals be developed they will contribute to our ambitions to increase biodiversity and to become carbon neutral by 2030 in the following ways:

- By linking up existing, traffic free travel routes to large parts of the City which will make sustainable, green travel options more attractive and accessible;
- The proposed tree planting will improve carbon sequestration and may offer opportunities for a degree of Carbon Offsetting.

- By increasing biodiversity on the site, including a community orchard and wild flower planting; and
- By rewilding the Northbrook to improve the aquatic environment.

13. Are there any other options?

13.1 There have been a number of suggestions over the last couple of years for this site but only one which has received such overwhelming support from the public consultation. The council committed some time ago that this would remain a public green space and one which will contribute towards a number of our corporate goals and we therefore recommend that the project is progressed as proposed.

Director, Net Zero Exeter and City Management, David Bartram

Author: David Bartram (covering report), Peter Burgess (DWT) and Anya Oliver (DWT).

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

Contact for enquires:
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Appendix 1: NORTHBROOK PARK PROPOSAL DELIVERY UPDATE

June 2022, Anya Oliver

1. Introduction and purpose

In Spring 2021 Exeter City Council and Devon Wildlife Trust undertook a joint consultation on the proposal for Northbrook Park to be developed into a wild arboretum and accessible community greenspace. In October 2021 ECC's Executive committee approved in principle that we progress to the next steps of delivery planning for Northbrook Park, subject to a more detailed proposal being returned to Executive at a future date.

The principal partners to this project are Exeter City Council and Devon Wildlife Trust, working together under the terms of the Valley Parks Committee MoU. We expect to agree similar partnership agreements with Devon County Council and others as needed.

This update note sets out a detailed, phased project delivery proposal for ECC to consider. We propose to put in place an Interim Management Agreement for DWT to manage the greenspace during the delivery of a project of capital works. ECC and DWT will work in partnership to deliver the project and to develop a long-term management agreement. The project will incorporate a package of support, including funding, for both the capital project delivery, and for longer-term management of the site by DWT.

This update should be read with the accompanying project budget.

The principal source of funding for this work is expected to be Community Infrastructure Levy (CIL). This paper will help inform the proposal made to the ECC Exec for CIL funding for the project.

2. Update

Since October 2021 there have been developments to some of the elements of the core proposal as follows:

Paths and routes:

ECC and DWT Officers met with Devon County Council Officers in May 2022 to discuss options for travel connections through the site with the intention of developing these options in greater detail as part of an integrated travel proposal. *The updated proposal assumes that there will be significant upgrade to cycling routes through the site that will be led by DCC and funded through separate sources.*

Northbrook stream:

The Naturalising Exeter's Waterways ('NEW') partnership project (ECC, DWT, DCC and Environment Agency) has assessed the feasibility of a number of options to address the poor environmental status of the Northbrook stream. These have arisen as a result of chronic poor water quality leading to a significant reduction in biodiversity value and public

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appreciation of the stream. In addition the heavily engineered and modified catchment leads to increase flood risk to properties downstream. Our objective is to resolve these issues through integrated nature based solutions. In the most recent phase of this work a river restoration proposal within the reach of the stream through Northbrook Park has been identified; the outline proposal is to realign and regrade the channel with meanders and a series of connecting wetland areas. This proposal requires further feasibility and detailed design work. In particular the solution will need to address the significant technical challenge of problems associated with the Combined Sewer Overflows (CSOs) in this reach. *The NEW project proposal provides enough information for access and visitor flow-routes through the park to take account of and 'future proof' for Northbrook stream interventions.*

Car-park and building:

Earlier this year a new gate was installed by ECC at the car-park entrance as a security measure to prevent unmanaged access to the car-park.

Unfortunately the building has recently been subject to some vandalism.

The car-park is occasionally used as a compound for near-by civil engineering works.

The existing outline proposal for the old golf-club-house building is to become part of a 'learning hub' to support low-key learning activities on site. DWT's proposal needs to be developed in greater detail and this will be led by DWT's Discover Nature Manager in close consultation with partners including ECC and local communities.

Some car-parking space is likely to be retained for accessibility to the site long-term. A detailed proposal is required for the car-park area to ensure appropriate car-parking is retained and designed to integrate with the site and its uses and audiences.

The partners propose a phased approach to development of the building and car-park. We have identified a programme of short-term use of the facilities supported by an appropriate agreement. We hope to reduce anti-social behaviour by bringing the building back into use. The temporary programme will also enable the partners to build a longer term plan based on feedback from trial programmes onsite.

3. Outline phasing

In October we set out some next steps to progress the development of plans for Northbrook Park and move into a delivery phase. These steps are set expanded here into more detailed phases. The phases don't follow consecutively, there is some overlap between them. In summary the phases are:

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- **P1 Development:** Partners agree the budget and outline project plan as well as management agreements. The project is developed in detail with other partners. An Interim Management Agreement is put in place (for at least four years), and the principles for formal long term arrangements are agreed).
- **P2 Tactical delivery:** Some smaller-scale tree planting and access works are agreed to generate community support and engagement. Includes a short-term agreement on use of the building for outreach activities.
- **P3 Infrastructure delivery:** Major access routes, paths, and other infrastructure improvements are delivered around the main park site.
- **P4 Habitats delivery:** Programme of habitat enhancements (involving local communities).
- **P5 Management / ongoing development:** This phase includes the transition from the initial capital project to DWT managing the site (under the Interim Agreement). Linked projects around the long term use of the building and the Northbrook stream will continue as separate strands.

The phases are set out in more detail below.

3.1. Phase 1 Development

Elements of this phase have already commenced. Some *key decisions* are required during this phase for the project to be delivered in full.

Note that we have identified the need for an Interim Management Agreement (to cover a proposed period of approximately four years) for DWT to manage the main area of greenspace and to lead project activities on-site. We expect this Interim Agreement to be enacted swiftly. We also envisage the partners will formally agree with their respective Boards that a Long-term Management Agreement will be put in place at the end of the term of the Interim Agreement (and this intention to be set out in an MoU). This approach allows:

- The project to start on site within the 22/23 financial year
- DWT to manage the project onsite as well as the land under the terms of the agreement
- The CIL funding identified to cover project costs as well as a transition-period of DWT management costs up until a long-term agreement is signed
- DWT to identify and secure additional funding for the project from Charitable Trusts and other smaller scale funding opportunities.

The building and car-park will be excluded from the Interim Management Agreement and will remain the responsibility of ECC. However we expect to agree terms for short-term use of these facilities for the partners and project team whilst a longer-term plan for these facilities are developed. Costs of this are included in the budget (under phase 2). The facilities are expected to be included in the long-term agreement.

Phase 1 budget: *The full budget includes project-delivery funding only in the first year (phases 1 and 2). In phase 1 this includes DWT staff time and legal costs.*

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Key elements of Phase 1 will be as follows:

Element	Actions		Who / When	Products
Project budget	- Fully costed budget agreed – detailing all income and expenditure.		ECC/DWT/(DCC): Summer 2022	Budget
Funding	<ul style="list-style-type: none"> - CIL funding confirmed - Funding plan in place for securing other income lines - Fundraising activities (for phase 4) 		ECC/DWT/(DCC): [September 2022? ECC Exec] DWT	CIL confirmation Funding plan
Development, working groups	- Establish working groups to develop detailed plans for core programme delivery elements (including integrated transport planning with DCC)		ECC/DWT/DCC/other partners and stakeholders From summer 2022	Working Groups (Terms of Ref)
Communications / community	<ul style="list-style-type: none"> - Develop a communications and stakeholder plan - Community involvement in planning and co-creation 		Officers ECC/DWT: Summer 2022 Autumn/winter 2022/23	Comms plan
Management agreement for site	<ul style="list-style-type: none"> - Agree options / principles for DWT long-term site-management - Partners gain in-principle agreement from Boards (DWT Board / ECC Cabinet) for long-term mgt agreement – establish overarching MOU <p>(Long-term management agreement to be developed and to gain full approval from partner Boards in parallel with other phases for adoption at the end of Interim Agreement term. Long term agreement will include terms for building/car-park).</p>	<ul style="list-style-type: none"> - Agree terms of Interim Management Agreement (eg 4 years) - Full approval from partner Boards as required - Enact Interim Mgt Agreement in time for [P3?] - Enact short-term building-car-park licence[(eg 6 months)] 	Officers ECC/DWT: Summer 2022 Boards ECC/DWT: Autumn 2022? Team and timetable tbc.	Interim Management Agreement Building/car-park agreement (temporary) MoU for key terms of long-term agreement

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3.2. Phase 2 Tactical delivery

Whilst the capital project is under development, we have identified key essential and enabling works or ‘quick wins’. These projects will help refine the vision, make targeted site improvements, enable diverse and new audiences to be engaged, and to extend our understanding of how the site is being used. Example elements identified:

- **Agree grass cutting regime:** agree a scaled back grass cutting regime in response to feedback and to help formalise access desire lines (*Summer*)
- **Install dog-bin:** this will help manage the growing issue of dog-waste currently on-site
- **Short-term programme to use the building:** following an initial assessment of the building and its condition we propose to develop a temporary agreement to use these facilities for activities to help support the overall project development
- **Tree surgery/pruning to improve access:** for example facilitating safe pedestrian access from Topsham Road, expanding visibility splays for cyclists at the larger access bridge by pruning laurel bushes (which impede access and create a sharp corner) and high-pruning boundary trees to improve light levels and reduce risk of anti-social behaviour (*from Autumn*)
- **Small scale native-tree planting:** to compensate for any tree/shrub removal and increase canopy cover on site we will undertake some high profile native tree-planting with communities in selected areas of the site (*from Autumn*).

The partners will agree a timetable to expedite this programme of delivery from the Summer. This work is likely to occur in advance of the Interim Management Agreement, and will therefore require partners to agree which organisations will lead each element.

The short-term agreement over use of the building will need to go through due process and be formalised as a discrete agreement (as part of phase 1).

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Phase 2 budget: *The full budget includes project-delivery funding only in the first year (phases 1 and 2). In phase 2 this includes DWT staff time and delivery costs associated with the elements set out above.*

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3.3. Phase 3 Delivery (access infrastructure)

This phase will establish the principal access routes around the site and key infrastructure, addressing key feedback around accessibility raised during the public consultation, including:

- New/improved access and welcome points and pedestrian and cycling routes through the site
- Improved boundary/access between the building, car-park area, and greenspaces
- Informal trails around the site
- Access furniture to include in-keeping signage, benches, dog-bin etc
- Cycle racks.

Phase 3 budget: *In the second year of project delivery (phases 3 and 4) we anticipate the Interim Management Agreement to be in place and for DWT to be managing the site. Therefore the budget includes project delivery costs as well as management costs in this phase.*

Note that the budget for phase 3 has been developed based on early assumptions about type, length and cost of path upgrade required, in consultation with colleagues at DCC. Whilst exact solutions and detailed budgets need to be developed and funding streams agreed, the budget provides a well-informed cost envelope. There will be some flexibility and tolerance to the finalised solutions, budgets and funding streams that will be able to absorb changes as plans develop.

3.4. Phase 4 Delivery (habitats and engagement)

This phase will complete the vision of a wild arboretum and community space including:

- Parkland tree and orchard planting

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- Meadow creation
- Pond creation
- Features and pause points (eg natural log benches and interpretation) to support people's enjoyment.

Phase 4 budget: *The budget for this phase includes project delivery costs as well as management costs.*

The budget includes delivery of habitats by contractors as well as time invested in community engagement, and delivery of habitat work by communities.

DWT will raise funds through additional sources to add value to this phase.

3.5. Phase 5 Management and ongoing development

Once the main site is established ongoing maintenance and enhancement work is essential. Elements of this phase include:

- Management and maintenance of the site
- Community engagement – attracting new and diverse audiences
- Develop long term plans for the building and car-park (sub-project)
- Progress river restoration plans for the Northbrook stream (associated project).

Phase 5 budget: *The main project delivery will be complete. DWT will be managing the site (under the Interim Agreement) for the remainder of this phase, which is three years. The CIL funding request includes a commuted sum to cover the management costs during this period.*

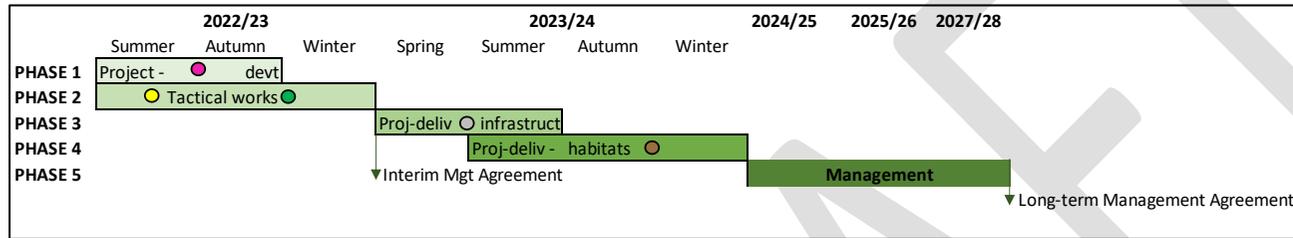
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3.6. Timeline

There will be some overlap between these phases and delivery is dependent on funding and other factors. Whilst funding and working groups are established, this provides an outline timeline proposal to aim for:



This phasing allows for some time- or season-specific elements, for example:

- Early tactical-delivery on site over Summer (Yellow dot)
- Agreement of CIL funding by ECC Exec in September 2022 (Pink dot)
- Tactical tree-works Autumn/Winter 2022/23 (Green dot)
- Main infrastructure works Summer 2023 (White dot)
- Main habitat works Winter 2023 (Brown dot)

CIL funding has been identified as a core income stream to support project development, project delivery and a contribution toward ongoing support for management by DWT. Other cash income and in-kind contributions will also support the project. This is detailed in Section 4.

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4. Costs and funding

4.1. Project costs

The overall project costs and associated income can be aligned with the phases:

Phase	Costs	£	Income
1 Development	Project management costs (DWT), legal costs, and DWT and other partners' contributions in time (in-kind-contribution IKC)	£17,341	CIL / IKC
2 Tactical delivery	Some infrastructure costs and tree-works delivered by ECC/contractors and DWT, costs associated with opening building	£25,635	CIL / IKC
3 Infrastructure	Main infrastructure works including access and paths. Management costs for DWT (under Interim Agreement)	£100,150	CIL / DCC sources / IKC
4 Habitats	Main habitat works led by DWT. DWT management costs. Legal costs associated with Long-term agreement	£67,110	CIL / other sources / IKC
5 Management	Revenue costs associated with management including staff time and contractors	£78,346	CIL (contribution) DWT
TOTAL		£288,583	

The timeline above allows for CIL funding to be released in the Autumn so that the project development and tactical delivery can be funded. Other income streams for phases 3 and 4 can continue to be agreed with partners (eg DCC) and sourced through fundraising (DWT).

The draft budget sets out capital costs for two years of project development and delivery, with a total cost of around £185,000. The total project/capital funding from ECC is around £119k, 64% of the project delivery cost.

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This budget *excludes* costs associated with ash tree removal, and the Northbrook stream project, both of which are to be funded separately.

The budget *includes* costs associated with re-opening the building and car-park on a temporary basis, but *excludes* large capital and long term costs associated with these, as the proposal and costs have yet to be developed.

The draft budget *assumes* that DWT will provide an in-kind contribution of 25% toward DWT staff costs. The budget does not include the costs of any other partner staff time.

We have *assumed* a contribution by DCC / funds identified by DCC to strategic cycle routes but *this has not yet been formally proposed*.

We have also built in some fundraising time and an assumption that external grant funding can be secured towards habitat enhancement and community engagement.

4.2. Commuted sum

We propose that in addition to the capital project costs a commuted sum of [approximately] £104,000 is granted to DWT as part of the management agreement. This will cover approximately four years of management costs (estimated at £25,500 p/a based on current costs).

4.3. Total cost

The total of the project delivery cost (£184,637) plus the commuted sum for management costs (£103,946) is **£288,583**.

4.4. Total funding

The total request for CIL funding is **£222,615** (77% of the total cost)

Other sources of funding (expected to be secured) total £65,968.

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4.5. Budget

COSTS	EXPENDITURE								INCOME									
	PROJECT				MANAGEMENT				TOTAL	SOURCES	PROJECT				MANAGEMENT			
	2022/2023		2023/2024		2024/25	2025/26	2026/27	2022/2023			2023/2024		2024/25		2025/26	2026/27		
PHASE 1	PHASE 2	PHASE 3	PHASE 4	SUB-TOTAL	PHASE 5	SUB-TOTAL	TOTAL	PHASE 1	PHASE 2	PHASE 3	PHASE 4	SUB-TOTAL	%	PHASE 5	TOTAL	%		
DWT staff time	8,341	4,584	3,046	7,036	23,008				DWT	2,085	2,346	1,985	3,008	9,424	5%			
Engineering and infrastructure	0	0	15,140	0	15,140				ECC (CIL)	15,256	23,289	43,365	36,759	118,668	64%	25,600	26,112	26,634
Tree surgery	0	4,920	0	0	4,920				DCC*	0	0	42,000	0	42,000	23%			
Tree planting	0	1,200	0	6,600	7,800				Grant/other	0	0	0	14,544	14,544	8%			
Path creation	0	0	60,000	0	60,000													
Other habitats	0	0	0	15,288	15,288													
Other features	0	0	0	7,200	7,200													
Building and car-park costs	0	12,600	1,224	1,248	15,072													
Legal and other costs	9,000	0	0	12,000	21,000													
PHASE SUB-TOTAL	17,341	23,304	79,410	49,373	169,428													
CONTINGENCY 10% (P2-P4)	0	2,330	7,941	4,937	15,209													
PROJECT TOTAL	17,341	25,635	87,350	54,310	184,637			184,637	PROJECT TOTAL	17,341	25,635	87,350	54,310	184,637				
Management costs (DWT) from P3			12,800	12,800	25,600	25,600	26,112	26,634	ECC (CIL)			12,800	12,800	25,600		25,600	26,112	26,634
MANAGEMENT TOTAL			12,800	12,800	25,600	25,600	26,112	26,634	MANAGEMENT TOTAL									
PHASE TOTAL	17,341	25,635	100,150	67,110	210,237			78,346	ECC (CIL) TOTAL									
TOTAL COSTS								288,583	OTHER SOURCES TOTAL				65,968					
									TOTAL INCOME								288,583	

*DCC funding: this assumes that DCC will identify separate funding for costs associated with significant cycle-path upgrades. This funding has not yet been agreed.

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5. Risks

A full risk register will need to be developed as part of the project. The principal risks associated with the delivery proposal set out here are:

Risk of phased approach, to long term objective

This proposal assumes that the partners will agree the principles of a long-term management agreement for the site and work together towards this aim. There is some risk that the long-term agreement will not be achieved following delivery of the capital project. This is low-probability due to the good working partnership between the parties and the precedent set by the lease arrangements on the Valley Parks (totalling 50 hectares, 50 times the size of this site), as well as the considerable investment by the partners to deliver the capital works. *The risk can be mitigated by the long term objectives being agreed in principle and set out in a robust MoU or similar.*

Risk of funding gap

The proposal asks for 77% of the total cost from CIL. This leaves a funding gap of nearly £66k unsecured. However, a considerable amount of the remaining funding (8%) will be fulfilled by DWT's contribution of staff time, as well as a fundraising target, which is very low-risk. We aim to secure funding via DCC for strategic transport connections, for the remaining 15%. The estimated costs of this part of the scheme could be scaled down in consultation with partners, if sufficient funding can not be identified. There is a contingency budget of 10% of costs within the capital budget. *The risk associated with the small funding gap can be mitigated by partnership budgetary management.*

These risks should be balanced against the risks of failing to find a solution to progressing the delivery of the proposal first set out in 2020, and consulted on in early 2021. These include reputational risks to the partners as well as practical management risks such as anti-social behaviour associated with the site (especially the building and car-park, not being actively managed).

6. Roles and consultation

The primary project partners are Exeter City Council and Devon Wildlife Trust. Both partners have developed excellent working relationships to progress Valley Park and associated site enhancement.

We have begun consulting with Devon County Council on strategic transport links.

The public consultation in 2021 has established community engagement which will be continued during the project's development.

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Key officers involved to date include:

DWT	Pete Burgess, Director of Nature Recovery	Anya Oliver, Business Development Officer
	Chris Moulton, Valley Parks Ranger	Dean Holland, Discover Nature Manager
ECC	Dave Bartram, Director of Net Zero and City Management	Daryl Taylor-Hopgood, Engineer
DCC	Zsolt Schuller (consulted)	
WSP	Peter Knight (consulted)	

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Equality Impact Assessment: Northbrook Wild Arboretum: Project Initiation and Funding

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Executive 06 September 2022 Council 18 October 2022	Northbrook Wild Arboretum: Project Initiation and Funding	1. That Executive Approve in principle the stages required to develop the Northbrook Wild Arboretum in partnership with Devon Wildlife Trust	No negative impacts, some positive impacts for disabled people and children.

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
		2. That Executive approve and recommend to Council the allocation of £288,583 in total towards the project made up of £222,615 from a mixture of the Community Infrastructure Levy funding or S106 if available, and contributions of £65,968 from partners	

Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact – some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	Neutral		No impact

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	Positive		Proposal includes improved access for wheelchairs and addition of disabled parking bays in the car park.
Sex/Gender	Neutral		No impact
Gender reassignment	Neutral		No impact
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Neutral		No impact
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral		No impact
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Neutral		Greater access to green spaces for all but the proposed education hub as part of the project will offer increased opportunities for learning and nature conservation for children.
Pregnancy and maternity including new and breast feeding mothers	Neutral		No impact
Marriage and civil partnership status	Neutral		No impact

Actions identified that will mitigate any negative impacts and/or promote inclusion

Officer: David Bartram

Date: 09/08/2022

REPORT TO EXECUTIVE

Date of Meeting: 6 September 2022

Report of: The Director of City Development

Title: Exeter Plan: Outline draft consultation

Is this a Key Decision?

Yes

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1 The report explains the progress made on the new Exeter Plan (Local Plan) and seeks approval for public consultation on an 'Outline Draft' plan which sets out the city vision, spatial strategy, draft strategic policies and potential development sites for comment.

2. Recommendations:

2.1 That the Executive approves the Outline Draft Exeter Plan (content included in Appendix A) as the basis for public consultation for eight weeks commencing on 26 September 2022; and

2.2 That the Executive gives delegated authority to the Director of City Development, in consultation with the Council Leader and Portfolio Holder for City Development, to agree minor changes to the Outline Draft Plan content before it is published for consultation.

3. Reasons for the recommendation:

3.1 As the Local Planning Authority for Exeter, the City Council has a statutory duty to prepare planning policy for the city. The Exeter Plan (the new Local Plan) will replace the two principal development plan documents for the city - the Core Strategy and the Local Plan First Review.

3.2 In autumn 2021, the Council held a public consultation on an initial Issues document which launched the work on the plan, explored a set of key issues and identified some of the initial considerations for the development strategy for the city. Since this consultation, further work has been undertaken on evidence to support the plan, the evolving development strategy, policy drafting and site assessment. This work has culminated in the preparation of an Outline Draft Plan for consultation.

3.3 Consultation is an important part of the process for preparing the Exeter Plan. The consultation will enable the wider community to inform the plan as it evolves towards further drafts, will fulfil statutory requirements and will be in accordance with the recently adopted Statement of Community Involvement.

4. What are the resource implications including non financial resources

4.1 Staff and budgets required to prepare the Exeter Plan were agreed at Council on 21 July 2020. The recommendations made in this report result in no direct additional resource implications.

5. Section 151 Officer comments:

5.1 There are no additional financial implications for Council to consider in this report.

6. What are the legal aspects?

6.1 The preparation of planning policy, usually through a Local Plan, is a legal requirement under section 19 of the Planning and Compulsory Purchase Act 2004. This report seeks approval to hold a consultation on an 'Outline Draft' of the Exeter Plan to comply with the provisions of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 requires the Local Planning Authority to undertake an early statutory consultation process.

6.2 The previous 'Issues' consultation was held to meet the requirements of Regulation 18, however it is considered important to give the community a further opportunity to influence the early stage of the plan, again in accordance with Regulation 18.

7. Monitoring Officer's comments:

This report raises no issues for the Monitoring Officer, as it follows the legal requirements of the authority, as detailed above.

John Street (Deputy Monitoring Officer)

8. Report details:

Background

8.1 Since the 'Issues' consultation was held between September and November 2021, further work has been undertaken to progress work on the Exeter Plan (the new name for the Local Plan). This work has focused on reviewing the responses to the previous consultation, various studies as part of the evidence base and the drafting of the plan content itself.

Summary of the consultation content

8.2 The consultation material will be in the format of an Outline Draft Plan. This will include a number of the key components of a full plan including:

- Exeter's Vision 2040;
- The spatial strategy setting out the pattern and high level characteristics of development;
- An initial set of draft strategic policies; and
- Potential development sites.

The outline draft format means that the full suite of potential, detailed policies and fully prepared development proposals will come forward for further consultation in 2023.

8.3 The vision that has been included is Exeter's Vision 2040, which was put together in 2019 in support of the Liveable Exeter initiative. It was agreed by key organisations from the city.

8.4 The proposed spatial strategy included for consultation has evolved significantly from the key components of the existing approach in our current plans, which provide for large urban extensions on the edge of the city. A key strand of the new spatial strategy is to steer the majority of development towards strategic brownfield sites in order to protect the city's landscape setting and therefore to retain Exeter's environmental quality. The strategy will also help to achieve the Council's net zero 2030 target, enable nature recovery, continue Exeter's economic success, including in the city centre, and support a healthy and inclusive city.

8.5 The Outline Draft Plan includes a series of approximately 30 thematic policies in various plan sections, which reflect the issues, which formed the basis of the previous consultation in 2021 (including the climate emergency, homes, employment and jobs amongst others). These policies do not give the full coverage required in the final plan however the majority are strategic in nature and so provide the overall direction for the plan. More detailed policies will be drafted for an additional consultation in 2023.

8.6 Finally, the consultation will include a series of development sites to meet the overall development requirements for the city in the period up to 2040. The consultation focuses on housing and mixed-use developments.

8.7 Government has calculated that Exeter needs to provide 650 homes per year. In order to meet this requirement a series of sites are identified. These include the eight large-scale strategic sites identified as part of Liveable Exeter, a series of smaller sites owned by the Council, sites promoted by third parties and a small number of sites, which are already allocated in the Core Strategy but have not yet been built out.

8.8 The material for consultation is included in Appendix A. It should be noted that the presentation style has evolved when compared with traditional planning documents because significant efforts are being made to improve the format of the consultation material to make it more engaging and intuitive. On this basis, there is more emphasis on presenting the content digitally, with a traditional, but simpler, 'document version' also being made available.

Outline draft plan consultation: Online format

8.9 In order to widen the interest in the Exeter Plan and seek involvement from a broader section of the community, the engagement on the Outline Draft Exeter Plan will evolve beyond the formal consultations which are traditionally undertaken.

8.10 As part of this wider approach, it will be important to make the Outline Draft Plan more engaging. This will be presented in a more exciting way using a new online engagement platform called 'Commonplace'.

8.11 Commonplace will be more flexible and more interactive, will support clearer and easier navigation and will enable the plan to be presented in a more attractive way with a greater focus on imagery. This greater emphasis on improving the digital presentation of the plan also aims to meet the evolving needs of the community by making plan content

more accessible on mobile devices. Finally, government is putting greater emphasis on the digitisation of the planning system and this format of presentation takes some steps in line with that wider agenda.

8.12 It should be noted that although the structure of the Exeter Plan consultation presentation will evolve, it will be in accordance with accessibility requirements. As already stated, a more traditional consultation document will be made available. The content of the material for consultation is presented in Appendix A.

8.13 To provide an indication of how the plan will look when presented in the digital format, Appendix B provides a diagrammatic structure.

Evidence

8.14 As already explained, a number of evidence base documents have been prepared in support of the Exeter Plan. This includes a Sustainability Appraisal, a Habitats Regulation Assessment, Local Housing Needs Assessment, Employment Study, landscape sensitivity assessment and a density study amongst others.

8.15 This evidence will be made available for comment during the consultation.

Consultation activities

8.16 Detailed consultation arrangements will be made in due course. However the consultation will:

- Start on 26 September 2022 and run for a period of eight weeks until 21 November 2022;
- Use the new Commonplace engagement platform as the basis for the consultation;
- Include questions on each section of the document;
- Include accessible consultation material;
- Include digital communication via the planning website and social media;
- Include hard copies of consultation materials in specified public places;
- Include a series of public exhibitions to enable face-to-face discussion;
- Be advertised in the local media, online and via social media; and
- Be advertised to the Council's existing planning policy consultation contact list.

8.17 The consultation will be undertaken in accordance with the newly adopted Statement of Community Involvement and the Consultation Charter.

After the Draft Plan consultation

8.18 A report will be brought back to Executive exploring the comments made to the consultation and explaining how they will be taken into account in shaping the next stage of the Exeter Plan. Further consultation will be held in 2023.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The Outline Draft Plan consultation will be important in ensuring the delivery of three corporate objectives set out in the Council's Corporate Plan:

- Delivering Net Zero Exeter 2030;

- Promoting active and healthy lifestyles; and
- Building great neighbourhoods.

The Exeter Plan will also play a central role in tackling congestion and accessibility, the focus of one of the three strategic programmes that addresses the current major challenges facing the city.

10. What risks are there and how can they be reduced?

10.1 There is a statutory requirement for Local Planning Authorities to prepare a Local Plan (the Exeter Plan) and the Outline Draft Plan consultation would meet the requirements of current planning legislation for the early involvement of the community in the plan-making process.

10.2 Government is, however, proposing significant changes to the planning system through the Levelling Up and Regeneration Bill. This could affect the scope of the Exeter Plan. As the detail of the Bill emerges these will be taken into consideration in the emerging plan to ensure it accords with the prevailing legislation of the time. Government is clear about the importance of maintaining progress with preparing plans.

11. Equality Act 2010 (The Act)

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

11.4 In recommending the Outline Draft Plan material for consultation, a variety of impacts have been identified on people with protected characteristics as determined by the Act. This is because of the breadth of topics covered by the Exeter Plan. The majority of the impacts are considered to be positive or neutral although because the full set of policies is still emerging it is not yet possible to assess the full impact of the plan. The associated public consultation will include a variety of engagement methods making consultation material widely available. The consultation will be undertaken in accordance with the emerging Consultation Charter and the draft Statement of Community Involvement which is itself subject to a separate Equality Impact Assessment.

12. Carbon Footprint (Environmental) Implications:

12.1 There are no direct carbon/environmental impacts arising from the recommendations to hold a public consultation on the Outline Draft Exeter Plan. However, the digital consultation methods will minimise the carbon footprint associated with holding the consultation. In addition, the consultation has a key focus on the climate emergency.

13. Are there any other options?

13.1 Consultation is a key part of the process for preparing a plan as required by legislation. This consultation is required to maintain timely progress. The only other option would see a later consultation which would delay formal engagement. This is not considered to be an appropriate option.

Director of City Development, Ian Collinson

Author: George Marshall – Assistant Service Lead: Local Plan

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

Adopted Exeter Core Strategy.
Adopted Exeter Local Plan Review.
Exeter Local Plan 'Issues Consultation Document'.

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The Exeter Plan



Outline Draft Plan
September 2022

**The Exeter Plan
Outline Draft**

Executive version: September 2022

Foreword

The new Exeter Plan looks ahead over the next 20 years to 2040 and will be the blueprint that shapes the future development of our city.

We've brought our ambitious Exeter Vision 2040 into this plan. The vision's seven, place-based outcomes are the golden threads that will drive the entire Exeter Plan.

Liveable Exeter, our bold city-making initiative, anchors the plan. Liveable is about building at least 12,000 new homes on brownfield land in the city as the alternative to developing in the countryside. This will protect our precious green spaces and surrounding hills.

Liveable will deliver sustainable new communities and so the whole Council is involved. The outline draft Exeter Plan supports other Council strategies including helping to achieve our net zero 2030 ambition, enabling nature recovery, continuing Exeter's economic success including in the city centre, providing the homes we need, developing our cultural offer, enhancing Exeter's rich heritage and supporting a healthy and inclusive city.

We will ensure quality of life and wellbeing are at the heart of all decisions – it is about living better in Exeter.

The City Council cannot deliver the aims of this plan without the support of Devon County Council, our three neighbouring district Councils of East Devon, Mid Devon and Teignbridge, Government agencies and our anchor institutions. We'll be working closely together over the next few months to refine the policies in the plan.

Exeter is a fantastic city and I know that all of our residents feel the same way, so it is very important that everyone has a say on how it develops in the future.

That's why we want everyone to make sure their voices are heard. We're reaching out to all of our communities and businesses with this draft plan. It will touch the lives of everyone living in the city as well as those working, studying in, or visiting Exeter, so everyone needs to own it and have a say.

I look forward to hearing from the people of Exeter and your ideas for shaping the future of our great city.

Councillor Phil Bialyk
Leader - Exeter City Council

Introducing the new Exeter Plan

As the Local Planning Authority for Exeter, the City Council has a statutory duty to prepare planning policy for the city. I'm delighted we now have a first draft of the new Exeter Plan which is ready for consultation with all of our communities across the city. In publishing this draft now, the City Council has delivered on its promise when we set out a timetable for a new Local Plan.

This early version of the Exeter Plan is not a full draft but is a significant step forward from the 'Issues' document which was consulted on last autumn. This launched the work on the new local plan, explored the key issues and identified some of the initial considerations for the development strategy for the city. Since then we have reviewed all the responses and further developed evidence to support the plan.

Over the next 8 weeks local residents, community groups and businesses will be able to comment on the future pattern of growth within the city, potential development sites and the strategic policies to guide new proposals.

The Exeter Plan is unlike any previous plans we have published because it is mainly digital. This is in line with Government guidance and best practice and makes the plan more engaging. In using a new online engagement platform called 'Commonplace' we have been able to present the Plan in a more attractive way with a greater focus on imagery.

Commonplace will be more flexible and interactive, will support clearer and easier navigation and will enable the plan to be to meet the evolving needs of the community by making plan content more accessible on mobile devices. This is part of our approach to widen interest in the Exeter Plan and seek involvement from a broader section of the community.

Councillor Emma Morse
Portfolio Holder, City Development and Planning – Exeter City Council

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Explaining the Exeter Plan

What is the Exeter Plan?

- 1.1 The Exeter Plan will shape the future of Exeter for the next twenty years and will be the basis for how the city continues to evolve and meet the needs of the community.
- 1.2 The Exeter Plan is the new name for the Local Plan. It will be the main planning policy document for Exeter, setting out where development should take place and providing the policies which will be used in making decisions on planning applications. Eventually, it will replace the current planning policies in the Core Strategy and the Local Plan First Review.

How have we got here?

- 1.3 The City Council started work on a new plan in 2020 and has been busy putting together the evidence needed to write the early stages of the Exeter Plan. The work was launched in autumn 2021 with an Issues Consultation which explained the key issues for the plan to address and started to look at what the pattern of development in the city might look like in future. We have used the input from that first consultation to write this Outline Draft of the plan.

What is the Outline Draft of the Exeter Plan?

- 1.4 The Exeter Plan is starting to take shape and the Outline Draft is the first version of this plan. It includes the vision for the city, potential development sites for a mixture of uses including housing, and a set of draft policies. This version is not a full draft. Further policies will be written and other sites may be included in future rounds of consultation. In particular, further, more specific policies within the various sections of the plan will need to be put together. Future versions of the Exeter Plan will also include a Proposals Map showing the location of allocations and designations across the city.

What happens next?

- 1.5 We will hold this consultation between 26 September and 21 November 2022 and would like as many responses as possible. The responses will be used to continue preparing the plan. Another consultation will be held in 2023. After that, a final draft document will be published for comment before it is submitted to the Planning Inspectorate for Examination. A Planning Inspector will use a series of Examination discussions to decide whether the plan needs any changes and then if it can be adopted by the City Council.

This is our city, this is our future

The Exeter vision 2040 and Liveable Exeter

- 2.1 Exeter has an ambitious vision for the next 20 years which can be summarised in a single sentence:

'By the time they are an adult, a child born in Exeter today will live in a city that is inclusive, healthy and sustainable - a city where the opportunities and benefits of prosperity are shared and all citizens are able to participate fully in the city's economic, social, cultural and civic life.'

- 2.2 The City Council adopted this vision in 2019 following engagement with our key partners and stakeholders.
- 2.3 The Exeter Plan also looks ahead to 2040 so it makes sense to bring the vision and plan together. This means that the plan will help to achieve the vision.
- 2.4 Our vision talks about a future Exeter that supports collaboration; ensures every resident has a home that is secure, affordable and healthy; has a strong and growing economy; encourages healthy, active lifestyles; has world-class education and training; supports a vibrant city centre and inclusive and connected neighbourhoods; is carbon neutral by 2030 and; will be known nationally and internationally as a city of culture.
- 2.5 The vision has seven key outcomes:
- An innovative and analytical city
 - A healthy and inclusive city
 - The most active city in the UK
 - Accessible world class education
 - A liveable and connected city
 - A leading sustainable city
 - A city of culture
- 2.6 The achievement of these outcomes drive the entire Exeter Plan. They map across to the key policies and development sites, ensuring that the plan drives the delivery of the vision.
- 2.7 In 2019 the City Council launched Liveable Exeter. Liveable Exeter will help deliver the Exeter Vision 2040 and this plan. It is a bold initiative to build at least 12,000 new homes in the city by 2040. It aims to transform previously developed land, strengthen existing communities and create new neighbourhoods. A series of Liveable Exeter principles will guide the largest developments to ensure they are of the highest quality.
- 2.8 Liveable Exeter is enabling the City Council to work collaboratively with our three neighbouring district Councils of East Devon, Mid Devon and Teignbridge, Devon County Council and key city organisations to create a connected city region of thriving linked yet distinct communities, each with their own distinct character and set within a world class natural environment. Close working with our partners will continue to be vital going forward.

- 2.9 The Government has awarded Exeter ‘Garden City’ status in recognition of our ambitious growth strategy.

The Liveable Exeter Place Board

- 2.10 The City Council cannot deliver Exeter’s vision on its own. That is why the Liveable Exeter Place Board was created. Each organisation represented on the Place Board has endorsed the Exeter 2040 Vision.
- 2.11 The Place Board enables collaboration between the city’s anchor institutions, sub-regional partners and the Government in delivering Liveable Exeter. The Place Board acts as a critical friend, challenging partners to achieve the principles which underpin Liveable Exeter.
- 2.12 The Place Board has an independent Chair and does not take decisions. Members engage communities and stakeholders to address the challenges in achieving the vision.

Delivering the vision

- 2.13 The Exeter 2040 vision will be delivered in different ways using a range of innovative tools including the Exeter Plan.
- 2.14 In 2022, the City Council launched a related planning initiative, the Exeter Design Quality Partnership. This is aimed at improving the way sustainability and design quality is addressed in planning in the city.
- 2.15 The partnership is between the City Council, landowners, funding institutions, promoters of development and developers and is framed by the Exeter Vision 2040 and Liveable Exeter. It is about raising the level of ambition in design and city making in Exeter, through collaboration.
- 2.16 Although the planning system enables high quality development it is not designed to deliver everything Exeter needs to achieve its vision. Other City Council plans, including a refreshed Corporate Plan, and the strategies of key institutions and partners, will also play a vital role.
- 2.17 The City Council is working closely with its delivery partners on other initiatives including:
- The net zero Exeter 2030 plan
 - The cultural compact and Exeter cultural strategy
 - Live and move – the Sport England local delivery pilot
 - The creative arc
 - Exeter city of literature (UNESCO)
 - InExeter – Exeter’s business improvement district
 - Devon County Council plans including the Exeter transport strategy
 - Heart of the South West Local Industrial Strategy
 - Exeter civic university agreement and the university 2030 strategy
 - Exeter College strategic plan 2020 - 2025
- 2.18 Linked to these other strategies, the Exeter Plan will act as a focal point for discussions with the Government and its associated departments and agencies (such

as Sport England, Homes England, Arts Council England, Environment Agency) to support the delivery of the Exeter 2040 vision. The plan will inform bids for external funding, including for housing, infrastructure, environmental schemes and other priorities as needed.

- 2.19 Looking at the wider area, the City Council is working with our partners at East Devon, Mid Devon and Teignbridge District Councils and Devon County Council to prepare a joint strategy for the wider area. This will help to align approaches on key strategic topics which affect the area as a whole.

The Exeter development fund

- 2.20 As well as planning for change over next 20 years through the Exeter Plan, the City Council realises that the way that development comes forward may need a new approach so that it is of a higher quality. As a result, five of the biggest public sector institutions in the city are working collaboratively with the City Council and the Community Interest Company, Exeter City Futures, to bring forward the Exeter Development Fund.
- 2.21 An outline business case has been prepared which explores an innovative concept for a publically owned infrastructure and development fund at a city level. The aims of the fund are to invest public assets and finance in development, capture the uplift in land value and re-cycle profits locally to deliver infrastructure, projects and priorities which increase the quality of development in the city and provide for our communities. This approach will bring forward development in the city in a very different way to usual.

Exeter City Living

- 2.22 Another approach to improving development quality is through Exeter City Living (ECL). This is a housing company wholly owned by the City Council which means that efforts can be made to provide developments which specifically help to achieve the aims of the city vision.
- 2.23 As an example, all ECL developments meet challenging Passivhaus building standards for energy efficiency and incorporate a range of other design quality innovations, setting the benchmark for other developments in the city.
- 2.24 Exeter City Living is a Profit for Purpose Company with future profits generated being returned to the City Council for investment into services for the community.

Spatial strategy

Spatial strategy: An explanation

- 3.1 A key part of the Exeter Plan is the spatial strategy. This spatial strategy section sets out the main principles for guiding the pattern and characteristics of development in the city. Details about the amount of development required for housing and employment are included in other sections of the plan. The spatial strategy flows from Exeter's Vision 2040 and was also discussed as part of the Issues Consultation in autumn 2021. It plans for the city's growth taking account of the wider sub-region, recognising Exeter as the most sustainable location for major development and reinforcing its position as the area's economic engine.
- 3.2 In putting together the spatial strategy, we have looked at a series of documents and viewpoints including national policies (in the National Planning Policy Framework), our current local planning policy (the Core Strategy and Local Plan First Review), ideas from the Liveable Exeter initiative, work previously put together on documents which are no longer progressing (such as the Greater Exeter Strategic Plan and the Development Delivery Document) and responses to the Issues Consultation.
- 3.3 The current strategy in our existing plans contains various principles, including directing some development close to the city centre on brownfield land, providing large urban extensions on greenfield land on the edge of the city and steering development away from the hills to the north and northwest of the city.
- 3.4 We have looked again at this spatial strategy so that it better reflects Exeter's Vision 2040 and the City Council's priorities set out in the Corporate Plan. The main change is to move on significantly from one of the main components of the previous approach – the provision of large, greenfield urban extensions on the edge of the city. These urban extensions have now largely been built out and have environmental challenges.
- 3.5 There are also some vital elements of the current strategy that we need to keep, including the protection of the city's hills. A key strand of the new spatial strategy is to steer the majority of development to brownfield sites in order to protect the city's landscape setting and retain Exeter's environmental quality. This strategy will also help to achieve the City Council's net zero 2030 target, enable nature recovery, continue Exeter's economic success and support a healthy and inclusive city. This transformational approach is closely aligned with the Government's Levelling Up policy which aims to reduce inequalities and promote opportunities for all.
- 3.6 Although the focus is firmly on brownfield development, some small scale greenfield development will help to provide a mix of sites, maintain a pipeline of development in the near future and deliver a five year housing supply (which helps us protect our sensitive environments). However these sites will be modest in the context of the significant brownfield focus.
- 3.7 The new spatial strategy is included in Policy S1. The development sites included elsewhere in the Exeter Plan have been guided by the spatial strategy.

S1: Spatial strategy

The spatial strategy will deliver on Exeter's Vision 2040 including the city's ambitions for net zero, health and wellbeing and the vitality of the city centre. Proposals are identified and will be supported when they:

1. Provide enough good quality homes of a variety of types in the Exeter City Council area to meet Exeter's needs.
2. Bring forward new forms of employment provision in the city and work with neighbouring Councils to ensure the employment needs of the wider functional economic market area are met.
3. Focus the majority of development on large, strategic brownfield sites, particularly in locations close to the city centre, district centres, local centres and key public transport hubs with good access to green infrastructure including the Valley Parks.
4. Enable the development of smaller brownfield sites as they become available.
5. Consider modest, greenfield development as a supplement to brownfield development.
6. Protect the sensitive Exe Estuary and the sensitive hills to the north and north-west of the city.
7. Steer development to avoid areas of higher flood risk where possible and manage residual flood risk as appropriate.
8. Enable development in locations which link effectively to the Valley Parks as vital green infrastructure whilst ensuring their protection and enhancement.
9. Provide high quality, mixed use development at optimal densities to minimise the need to travel and maximise walking, cycling and public transport.
10. Deliver the range of infrastructure needed to support high quality development and our communities in a timely manner.

Liveable Exeter principles

- 3.8 Exeter is a growing city and we are ambitious for its future. The Liveable Exeter initiative originally set out sites that could accommodate 12,000 new homes within a series of high quality, brownfield developments.
- 3.9 We want to increase the population living in the central areas of the city and encourage people who may have left Exeter to return to live in a variety of new homes including apartments. Homes will be built within vibrant, neighbourhoods that are walkable and have cafes, shops, community uses and workplaces.
- 3.10 We are committed to making the best use of previously developed land in the city by optimising density to support the significant increase in new and affordable homes and infrastructure we desperately need. This will often mean developing at densities above those of the surrounding area on most sites. A design-led approach to optimising density is advocated which should be based on an evaluation of the site's attributes, its surrounding context and capacity for growth and the most appropriate development form. The highest densities should be located in the most accessible and sustainable locations close to the city centre and public transport.

- 3.11 The spatial strategy requires significant brownfield development on large development sites as identified elsewhere in the Exeter Plan. These larger sites offer the potential for new, exciting forms of sustainable, high quality mixed use development.
- 3.12 We understand the importance of the large brownfield sites in meeting our development needs. In 2019, the City Council published its transformational housing delivery programme under the banner of Liveable Exeter. This set out the City Council's ambitions to help meet our housing needs by developing eight strategic brownfield sites across the city.
- 3.13 Whilst these sites form an integral part of the spatial strategy, Liveable Exeter is not just a series of sites but a growth and city-making initiative governed by six principles which have been drawn from Exeter's Vision 2040 and national Garden City principles. In adopting the Liveable Exeter principles we aim to strengthen and reinvigorate existing communities and repurpose and transform other parts of the city, which need to change. Collectively the Liveable Exeter principles will achieve the following:
- Development proposals which make the best use of brownfield land and build at optimal densities. All developments should look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible.
 - New development that contributes positively to an area's character and identity, creating or reinforcing local distinctiveness.
 - New development that supports thriving high streets and local centres, ensuring that for local trips, walking and cycling become the most convenient option, and for longer trips, public transport becomes viable. People-friendly, human-scaled streets and junctions should be a joy to walk and cycle along and incorporate high quality design, materials, improved air quality and overlooking from surrounding buildings.
 - Developments that adopt innovative approaches to mixing land uses, and delivering a high quality public realm. Where possible, different land uses should be mixed together, with residential above businesses and community uses commonplace.
 - High quality buildings which support the health and well-being of their occupants, and are responsive to the changing way we live, work and spend our leisure time. Public spaces and private communal areas will be safe, accessible, inviting and well used, without the fear of crime. Individual dwellings should provide sufficient comfort, natural light, privacy and quiet.
- 3.14 The Liveable Exeter principles will apply to the large development sites identified in the Exeter Plan and other major sites that may come forward in future. These principles are a vital element in steering development and go hand in hand with the spatial strategy of delivering quality development on brownfield land.
- 3.15 The City Council will work collaboratively with landowners and developers to promote the Liveable Exeter principles. Wider planning policy, masterplans, design codes, supporting evidence and other design tools will support this approach, recognising that the characteristics of future development will be site specific.

- 3.16 The Liveable Exeter principles are included in Policy S2. The policy sets out the requirements for the standard of development that Exeter City Council will expect for all large-scale brownfield developments in the city. Developments that fail to achieve the standards set out in these principles will be refused.

S2: Liveable Exeter delivery principles

The delivery of large-scale, brownfield developments will be supported.

Planning applications for all large-scale development proposals must be accompanied by a masterplan which includes a vision and planning/design framework to guide the comprehensive development of the wider site area.

All large-scale development proposals must demonstrate how each of the following Liveable Exeter principles and requirements will be achieved.

Principle 1: Memorable places. Development will:

- Contribute positively to an area's character and identity, creating local distinctiveness and reinforcing its role within the city.
- Respond positively to local topography, open spaces and watercourses and maximise views to Exeter's natural and built landmarks and features.
- Make efficient use of land so Exeter remains compact and walkable.
- Enable sustainable transport for access to the city centre, district and local centres, employment areas, the River Exe and the Valley Parks.
- Contribute to the varied and innovative social, economic and cultural offering in the city.

Principle 2: Outstanding quality. Development will:

- Build at optimal density and maximise the development footprint, incorporating the highest densities at the most accessible and sustainable locations.
- Incorporate innovative solutions within buildings, transport provision, energy and other infrastructure to achieve our ambitions for a net-zero city by 2030.
- Enhance Exeter's natural, built and historic environment, particularly at gateway and arrival points, main routes into the city, city centre, the Ship Canal and Basin, the River Exe and the Valley Parks.
- Provide innovative and exciting education, research, skills, work and leisure destinations in prominent and accessible locations.
- Ensure neighbourhoods function effectively in the long term by incorporating stewardship measures which provide for the effective management and maintenance of the public realm and communal private spaces.

Principle 3: Welcoming neighbourhoods. Development will:

- Provide a variety of high quality, affordable and market homes catering for local needs.
- Support a wide range of accessible, local jobs and provide the education and skills to support local employment.
- Support thriving high streets, district and local centres, and create new centres where appropriate, delivering local shops, open spaces, community, education and health facilities.
- Provide safe, healthy, accessible and inclusive streets and public spaces which are people-friendly, human in scale, well managed and cared for.
- Phase delivery to ensure important infrastructure and facilities are provided early on.

Principle 4: Liveable buildings. Development will:

- Ensure that homes are adaptable to changing demands and lifestyles.
- Include beautiful buildings which complement local character using high quality designs and materials.
- Ensure buildings are energy efficient, adopt a fabric first approach and apply high performance standards such as Passivhaus and whole-life carbon assessment.
- Provide homes that are predominantly dual-aspect ensuring high levels of natural daylight and ventilation.
- Be laid out and designed to maximise internal air quality.

Principle 5: Active streets. Development will:

- Incorporate active travel and passive surveillance measures at the outset of development design.
- Make direct connections to the active travel network and key destinations.
- Reallocate road space to maximise active travel, public transport, shared mobility and the provision of attractive public spaces through seating and planting.
- Maximise parking and storage for cycling, provide infrastructure to support electric vehicles and bicycles and minimise parking for private cars.

Principle 6: Spaces for people and wildlife. Development will:

- Provide and enhance connections to existing green networks and spaces including the Valley Parks and Green Circle.
- Maximise opportunities for landscaping, planting and trees using tools such as the Urban Greening Factor.
- Promote vitality and inclusivity by providing safe and attractive places for play, recreation, food growing and socialising outdoors.
- Ensure that space is created specifically for nature to deliver biodiversity gains within the city.



Climate change

Vision – A leading sustainable city

Addressing climate change links to the aim in the 2040 vision of being a leading sustainable city. Mitigating and adapting to climate change will help to improve energy efficiency in buildings, provide renewable and decentralised energy and respond to flood risk.

Vision – Healthy and inclusive

Addressing climate change links to the aim in the 2040 vision of creating a healthy and inclusive city. Mitigating and adapting to climate change will help to minimise energy costs, provide more resilient energy networks and overcome health inequalities.

Objective: Make the fullest possible contribution to the mitigation of, and adaptation to, climate change and work towards creating a carbon neutral city. Helping to deliver the strategic priority of net zero Exeter by 2030.

Introduction

- 4.1 The planet is facing huge environmental challenges caused by human interventions which are increasing carbon dioxide and other greenhouse gas emissions. In recognition of this, the City Council has declared a climate emergency and pledged to work towards creating a carbon neutral city by 2030. We have adopted the Net Zero Exeter 2030 Plan which sets out what Exeter will need to put in place in order to be net zero carbon by 2030.
- 4.2 The Exeter Plan will include policies and proposals that contribute to meeting this challenging ambition and to make the most of the opportunities of a net zero carbon city.

Net zero Exeter

- 4.3 The city's ambition, to be carbon neutral by 2030, is 20 years earlier than the 2050 national net zero target required under the Climate Change Act. This is an incredibly challenging ambition but the nature of the issue justifies this. Success will only be achieved through a genuinely collective effort; we need all organisations, individuals and institutions to play their part.
- 4.4 The City Council is working with the public and private sector to bring forward the Exeter Development Fund to lead the way in developing the city in a way that contributes to the net zero ambition. This work acknowledges that the current approaches to development delivery will not deliver Exeter's net zero aspirations.
- 4.5 The City Council is also collaborating with the University of Exeter. The University is world-leading in environmental intelligence. It works closely with a range of public and private sector partners in delivering education, research and knowledge exchange activities. Its ambitions include delivering a flagship innovation hub within a

state of the art building in Exeter city centre within the proposed City Point development (part of the East Gate site considered later in the plan).

- 4.6 Looking for widely, the performance of buildings will be vital in achieving net zero. The Government's Future Homes Standard seeks to deliver homes that are zero carbon ready by 2025. The Government has also set out a new Future Buildings Standard which provides a pathway to deliver new non-domestic buildings that are zero carbon ready from 2025. Changes have already been made to the buildings regulations to reduce carbon emissions and provide a stepping-stone to implementing the new standards. The City Council will keep the Government's progress in achieving these standards under review and, if necessary, set our own energy efficiency requirements to ensure new development is making reductions in carbon emissions and also playing its role in helping to minimise fuel bills during these challenging times.
- 4.7 However, it is not just the efficiency of buildings themselves that matters. The location of new development and the density and urban form is also key. Urban intensification can enable growth while achieving a reduction in travel demand and an increase in sustainable travel. Higher densities and combinations of uses are likely to provide greater potential for local energy networks and cost effective low carbon energy.
- 4.8 Renewable sources of energy include sun, wind and water power, ground and air source heat pumps, biomass energy from organic matter and energy from waste. These sources can offer diversity and security of supply and can reduce harmful emissions to the environment. Whilst grid electricity is increasingly being supplied by renewables, there is still a need to maximise onsite renewable energy generation and community led renewable and low carbon energy schemes also have an important role to play
- 4.9 Green infrastructure and Sustainable Drainage Systems (SuDS) also have an important role in climate change mitigation. Through carbon sequestration (for example, trees storing carbon) and urban cooling they have a role that extends beyond the obvious environmental and health benefits.
- 4.10 Policy CE1 brings together many of these considerations to ensure they are addressed together. All development should be planned over its whole lifetime to limit carbon emissions and developers will be required to demonstrate how they will contribute to achieving net zero.

CE1: Net zero Exeter

Exeter has an ambition to be net zero by 2030. Development proposals will be required to demonstrate how they will support the achievement of net zero through:

- Considering location, urban form, density and place-specific solutions
- Minimising the need to travel and maximising walking, cycling and public transport
- Applying a fabric first approach to maximise energy efficiency
- Maximising renewable and low carbon energy generation
- Applying the principles of the circular economy
- Utilising SuDS and other sustainable approaches to flood risk management
- Providing green infrastructure, biodiversity net gain, and landscape-led schemes

Local energy networks

- 4.11 By considering existing and proposed development, and by working in partnership with developers and other organisations, more decentralised energy networks can be set up that will support the move to a net zero carbon city.
- 4.12 On average, standard centralised power generation (like that which provides power through the grid to most properties) is only 30% efficient, whereas decentralised generation is typically twice as efficient. The greatest efficiencies can be achieved through linking combined heat and power (CHP) plants including energy from waste (EfW) plants, to local energy networks. These provide heat and electricity via a local heat network of pipes and infrastructure which properties can connect to.
- 4.13 There are already heat networks in the city, including at Monkerton, to show how these projects can be provided. The City Council has now identified areas where the scale of development or the heat use opportunities are great enough to justify the planning, design and delivery of heat networks. Policy CE2 identifies the areas where evidence suggests local energy networks are feasible and viable. The policy also requires that new development outside these areas, but in reasonable proximity to a network, be constructed to allow connection (as and when a network is rolled out). Any local energy networks being established adjacent to the City Council's boundary will take account of development proposals outside of the city and be planned and delivered so that a single energy network is provided, where that is appropriate and viable.

CE2: Local Energy Networks

Local energy networks are proposed in the following areas:

- a) Monkerton and Hill Barton;
- b) The city centre, Heavitree Road and Wonford;
- c) Marsh Barton, Matford, Water Lane and Haven Banks;
- d) St. David's, Red Cow Village, New North Road and the University;
- e) South Gate, West Gate and St Thomas; and,
- f) In other locations across the city where it is shown that it is feasible and viable to bring forward a local energy network.

Within these areas, and throughout the city within 500 metres of any local energy network subject to a contractual commitment, all new development (either new build or conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more dwellings, must be constructed to have heating (water and space) systems compatible with the proposed or existing local energy network and include provision for the necessary pipework from those in-building systems up to the appropriate site boundary to allow connection to the network when available.

Any large-scale residential or non-residential development must demonstrate that consideration has been given to whether it is feasible and viable for that development to be connected to any local energy network.

Flood risk

- 4.14 Increasing flood risk is one of the most high profile consequences of climate change. The recent climate pack from the Met Office suggests that for Exeter, winter precipitation could increase by 5-19% by the 2030s; leading to an increased risk of river and surface water flooding.
- 4.15 The spatial strategy seeks to avoid areas of higher flood risk following a sequential, risk-based approach to the location of development. However, development in the urban area on brownfield sites has significant and widespread benefits including the potential to help mitigate climate change by limiting the need to travel and supporting local energy networks. In order to deliver the sustainable regeneration of brownfield areas such as at Water Lane and Marsh Barton, flood risk will need to be addressed and managed through design and site layout to ensure the development is appropriately flood resistant and resilient.
- 4.16 Policy CE3 sets out how the City Council will consider flood risk. In all areas development will need to integrate Sustainable Drainage Systems (SuDS) into the design and layout. SuDS mimic natural drainage processes and the benefits include minimised costs, reduced overall flood risk, enhanced nature conservation and amenity value, recycling valuable water resources, and better control of pollution from urban run-off. Where SuDS are not appropriate, appropriate flow attenuation facilities or mitigation measures will be required.
- 4.17 In areas of high flood risk (Flood Zone 3) the risk of flooding should be recognised as a key constraint to development. New development should be seen as an opportunity to make improvements in green and other infrastructure to reduce the causes and impacts of flooding in accordance with the NPPF (paragraph 161).

CE3: Flood risk

In areas at risk of flooding, development will only be permitted where it is demonstrated that the proposal meets the sequential test and, where appropriate, the exception test. A site specific flood risk assessment will be required for all development proposals at risk of flooding. In Flood Zone 3 residential development will only be permitted where it meets the sequential test and the exception test and also contributes to reducing the overall flood risk. All development proposals must mitigate against flood risk by utilising SuDS unless there is clear evidence that this would be inappropriate.



Homes

Vision – A healthy and inclusive city

Addressing Exeter’s housing needs links to the aim in the 2040 vision of creating a healthy and inclusive city. Enabling our communities to access the homes they need will help to promote both physical and mental health, provide safety, security and reduce inequalities.

Vision – A liveable and connected city

Addressing Exeter’s housing needs links to the aim in the 2040 vision of being a liveable and connected city. Providing new homes close to jobs, services and facilities will help to provide high quality neighbourhoods and create inclusive communities.

Vision – A leading sustainable city

Addressing Exeter’s housing needs links to the aim in the 2040 vision of becoming a leading sustainable city. Helping our communities to access the homes they need, in locations close to jobs, services and facilities, will bring environmental, social and economic benefits to the city.

Objective: Provide the quantity, type and quality of homes that Exeter needs in the right locations. Helping to deliver the strategic priorities of building great neighbourhoods and promoting active and healthy lifestyles.

Introduction

- 5.1 We know that housing is a big issue, not just in terms of the number of homes we need but also in terms of their quality; Covid-19 has underlined just how much we need good quality housing. The Exeter Plan will help to address the shortage of affordable homes in the city and consider how best to provide the good quality accommodation we all need. Young adults, families, older people, those with disabilities, key workers, students and gypsies and travellers all have specific housing needs which we need to meet.

Housing needs

- 5.2 The Government requires the City Council to plan for 650 new homes to be built in Exeter each year.
- 5.3 Policy H1 sets out our proposed approach to meeting the Government’s housing requirement for Exeter, identifying four sources of housing supply between 2020 and 2040. The total supply of 14,300 homes for twenty years allows for a healthy headroom of 10% above the target of 650 new homes per year. This headroom will allow for choice and competition in the housing market and means that the Exeter Plan will be resilient to uncertainties such as a delay in developing a particular site or changes to housing needs or Government policy.
- 5.4 Just over 2,000 homes have been built in Exeter since April 2020 and planning consents (including permissions awaiting Section 106 Agreements) are in place for a

further 5,380 homes. In addition, we anticipate that just under 700 homes will be built on windfall sites during the plan period. Windfall sites are those that cannot be identified in the plan because they come forward on a variety of sites unexpectedly during the plan's lifetime.

- 5.5 The number of homes on new allocations in the plan is calculated by deducting the homes which have already been provided, existing permissions and windfalls from the total housing requirement. As Policy H1 shows, to meet the housing requirement we need to allocate sites for around 6,205 new homes. As well as housing, the larger sites will provide various other uses and infrastructure to provide high quality new neighbourhoods.

H1: Housing requirement

Exeter City Council will target the delivery of at least 650 homes per year between 2020 and 2040. To meet this target and allow for a headroom of 10%, delivery of 14,300 homes is proposed from the following sources:

- 2,024 completions in 2020/21 and 2021/22
- Approximately 5,380 homes from existing planning consents
- Approximately 6,205 homes on site allocations
- Approximately 691 homes on windfall sites

- 5.6 In meeting the Government's housing requirement, it is important that we help to deliver the variety of homes that our communities need, including affordable homes. This is particularly important at this time when the costs of living are high and when many people face difficulties in paying everyday bills.
- 5.7 We are currently gathering evidence about the different types of homes that are needed in Exeter. Detailed policies to enable the provision of homes to meet these needs will be included in the next round of consultation on the Exeter Plan.

Potential development sites

- 5.8 Policy H2 lists the development sites that we suggest should be allocated to help meet the housing requirement. In line with the spatial strategy set out in policy S1, there is a focus on large, brownfield sites located close to the city centre and key transport hubs, with good access to green infrastructure including our Valley Parks. Eight of the sites were included in the original Liveable Exeter work.
- 5.9 The list also includes a number of smaller brownfield sites and some greenfield sites that are within the urban area. A small number of the sites are currently allocated in our existing plans and need to be included in the Exeter Plan because this plan will replace our existing policies. Taken together, the sites provide a good balance of location and scale to enable the stable provision of homes over the twenty years of the plan.
- 5.10 The majority of the sites can be built within twenty years. The exceptions are some of the larger brownfield sites which are likely to take more than 20 years to be fully redeveloped. The policy indicates how many homes we think each site could provide

by 2040. Further details of how each site could be developed is provided in the Potential Development Sites section of the plan.

H2: Housing allocations

The following sites are proposed for allocation in the Exeter Plan for the provision of new homes, with associated infrastructure:

Large scale brownfield development sites: Mixed use	
Marsh Barton	1,880
Water Lane	1,180
East Gate	750
Red Cow	430
Sandy Gate	250
North Gate	200
West Gate	200
South Gate	170
Predominantly residential sites:	
St Bridget Nurseries, Old Rydon Lane	334
Land to the north, south and west of the Met Office	225
Land south of the A379	184
12-31 Sidwell Street	51
Land east of Newcourt Road, Topsham	43
Devon & Exeter Squash Club, Prince of Wales Road	40
Land at Newcourt Road, Topsham	38
Land adjoining Silverlands, Chudleigh Road	37
Belle Isle Depot, Belle Isle Drive	33
Land west of Newcourt Road, Topsham	31
Chestnut Avenue	26
Former overflow car park, Tesco, Russell Way	18
Land behind 66 Chudleigh Road	16
Land east of Pinn Lane	14
Land at Hamlin Lane	13
Yeomans Gardens, Newcourt Road, Topsham	13
Fever & Boutique, 12 Mary Arches Street	10
88 Honiton Road	10
Garages at Lower Wear Road	9
99 Howell Road	6



Economy and jobs

Vision – Innovative and analytical city

Addressing the need for economic growth and job creation links to the aim in the 2040 vision of being an innovative and analytical city. Encouraging growth and investment in the knowledge economy will support new sectors, develop innovation and increase prosperity.

Vision - Accessible world-class education

Addressing the need for economic growth and job creation links to the aim in the 2040 vision of delivering accessible world class education. Developing training and skills for all will enable equality of opportunity in new sectors and support economic growth

Objective: Develop the potential of the city for economic growth with a particular focus on the knowledge economy and ensure the benefits of jobs, skills and training are available to all. Helping to deliver the strategic priority of delivering net zero Exeter by 2030 and building great neighbourhoods.

Introduction

- 6.1 The city is at the heart of the Greater Exeter area and has one of the fastest growing economies in the UK. The Liveable Exeter initiative sets out a vision for a growing, thriving city region where significant housing delivery attracts major business investment and high-value jobs. Whilst Exeter has, like all cities, been significantly affected by Covid-19, predictions are that it will be one of the quickest to bounce back. There is a strong ambition to grow the economy with a focus on innovative business sectors, making the most of a skilled workforce, the benefits of the University and the world-leading research on climate change. The new Exeter Plan needs to support the economy and green growth by identifying the employment space and infrastructure we need. This will help to increase prosperity and wellbeing.
- 6.2 Exeter is a relatively prosperous city, and its economy has been growing faster than similar cities over the last two decades. The business growth rate is also strong. Whilst the competitiveness of the city's economy is slightly below the national average, it has increased in recent years.

Economic growth

- 6.3 There is significant potential in Exeter to take full advantage of the opportunities for economic growth. There will be a particular focus on unlocking further growth potential within the knowledge economy, especially transformational sectors.
- 6.4 Transformational sectors that have potential for growth in Exeter include:
- **Data analytics:** This is the science of examining raw data using automated means with the purpose of drawing conclusions about that data. This is a specialism which can support innovation across a range of industries. The presence of high performance computing in the Exeter area, together with the analytical and research skills in the public and educational sectors gives a strong foundation for development.

- **Environmental futures:** Supported by the data analytics specialism, there is a concentration of high level environmental expertise in the area including at the Met Office and the University of Exeter. The city is a world leader in terms of climate change modelling, research and agricultural technology and locally there is a real focus on innovation and environmental intelligence. The need for environmental innovation has never been higher and Exeter is very well-placed to take this forward.
- **Health innovation** - The Local Industrial Strategy recognises an emerging health innovation cluster in the area while the Royal Devon University Healthcare NHS Foundation Trust and the University of Exeter fund the Joint Office for Clinical Research. The South West Digital Health Accelerator is based in Exeter to provide support for local digital innovations in the health sector.
- **Digital innovation** – This includes high growth digital industries such as microelectronics, autonomous systems, remote sensing, satellite applications, quantum engineering, cyber security and virtual reality. Existing expertise and world-leading research in these areas provide the building blocks for various advanced sectors including engineering, digital health, creative industries, smart energy and environmental resilience.
- **Other emerging transformational businesses** - Clearly, a key characteristic of innovation is that it is not predictable therefore perhaps the greatest potential for growth is in other transformational businesses as yet unidentified.

6.5 We will support these new transformational businesses, whether they be spinoffs from the University of Exeter or other local bodies, new start-ups or inward investment by existing firms.

6.6 In supporting economic growth, the City Council aims to ensure that all of the city's citizens gain from the prosperity and wellbeing generated by the local economy. Evidence indicates that transformational sectors have the potential to make the greatest contribution to increasing productivity and earnings within Exeter. Policy EJ1 takes a flexible and supportive approach by encouraging appropriate development (sustainably located and avoiding conflict with neighbouring uses) within these sectors and highlighting the importance of working with partners to encourage growth and investment.

EJ1: Economic growth in the transformational sectors

Exeter City Council is committed to supporting Exeter in becoming one of the UK's leading knowledge economies. To help deliver this, appropriate development proposals for the following transformational sectors will be supported:

- Data analytics
- Environmental futures
- Health innovation
- Digital innovation
- Other emerging transformational sectors

Working in partnership with others, Exeter City Council will seek to deliver improvements to digital and other infrastructure, improved education and training and 'soft landing' packages to encourage and support growth in the transformational sectors.

Retention of employment land

- 6.7 The supply of employment land, and its protection for employment use, plays a critical role in responding to the opportunities for economic growth. Existing employment land can often provide space for new employment uses or additional space to allow existing businesses to expand. However, existing employment land can also provide new opportunities for mixed-use development, combining housing and employment in ways that meet the needs of growth sectors now and in the future.
- 6.8 Policy EJ2 seeks to protect those established employment areas that are key to meeting our future employment needs, whilst also allowing change of use where it can be established that mixed use development could sustain both employment and housing development or where there are unacceptable amenity impacts from current employment activities.

EJ2: Retention of employment land

The established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained in employment use. Elsewhere, the loss of employment land to an alternative use will be acceptable where land is allocated for redevelopment or where it is demonstrated that employment use is not viable or needed to meet current and long-term needs up to 2040 or where current employment uses have an unacceptable amenity impact on local residents.

- 6.9 New employment sites may need to be identified to meet the specific requirements of the transformational sectors and act as a catalyst for further growth (in particular by providing suitable accommodation for start-ups). This could come forward through the master planning of large-scale development sites.

New forms of employment provision

- 6.10 New forms of employment can also support economic growth. Flexible working is becoming more important and this must be supported by future development. Shared workspaces help to increase employment densities and provide flexible opportunities for SME's and traders. Incorporating work hubs, co-working, collaborative

workspaces and live-work units into all large-scale developments will ensure a truly liveable and sustainable environment and support the national shift to alternative ways of working. Shared use of public and community spaces can also contribute; community cafes and creative hubs can connect individuals and allow collaborative working.

- 6.11 It will also be important for all new homes to include homes offices or at least to be designed in a way to facilitate home working. This will be brought forward through a policy on minimum space standards for new homes in future versions of the Exeter Plan.
- 6.12 Policy EJ3 supports new forms of employment provision and ensures delivery at large scale developments.

EJ3: New forms of employment provision

To promote economic growth, reduce the need to travel, deliver high quality development and support flexible working, development proposals for the following new forms of employment provision will be supported:

- Work hubs
- Collaborative workspace
- Live-work units

Large-scale developments will be required to include these forms of provision unless it has been demonstrated robustly that the demand has been addressed in other ways.

Access to jobs and skills

- 6.13 Employment is a route to supporting inclusive growth and social inclusion. For people who are not economically active, pathways into employment need to be person-specific, providing opportunities to build confidence and personal skills for entering work as well as formal skills and qualifications. Exeter City Council will work with regional and local partners such as Building Greater Exeter, colleges, and training providers to build skills and improve pathways to work for young people and disadvantaged groups. By improving access to employment, we will reduce poverty and inequality, increasing the city's resilience and enhance the economic and social wellbeing of every community.
- 6.14 To support the realisation of this ambition, development proposals should remove barriers and contribute to enabling access to employment for local residents, developing skills and supporting employment initiatives where:
- New homes are developed; or
 - New workspace and other commercial development is created; or
 - Other major development arises which would generate new employment including during the construction phase.
- 6.15 This will be achieved through the development, submission and delivery of an employment and skills plan for all of the above which are considered to be 'major' developments.

EJ4: Access to jobs and skills

Exeter City Council is committed to supporting access to employment and learning opportunities, social mobility, and city-wide inclusion. As part of this commitment, Exeter City Council will support development proposals that contribute to:

- Enabling access and removing barriers to employment for local residents
- Facilitating skills development and learning opportunities
- Supporting employment initiatives (through work placements, apprenticeships and job creation)
- Social value

All major development proposals will be required to submit, and deliver the provisions in, an Employment and Skills Plan to demonstrate that the above objectives will be met.

Draft for Executive



The future of our high streets

Vision – City of culture

Addressing the future of our high streets links to the outcome in the 2040 vision of Exeter being a city of culture. Ensuring the continued vitality of the city centre and other high streets will require a wider variety of uses in these locations with cultural activities being increasingly important.

Vision – Liveable and connected

Addressing the future of our high streets links to the outcome in the 2040 vision of Exeter being a liveable and connected city. Ensuring the continued vitality of the city centre and other high streets will mean that communities can thrive and build identity around their local centres.

Objective: Enhance the vitality of the city centre and our other high streets so they continue to provide a key role in our day-to-day lives supporting communities, prosperity and cultural identity. Helping to deliver the strategic priorities of promoting active and healthy lifestyles and building great neighbourhoods.

Introduction

- 7.1 Our high streets are changing. Traditionally centres for retail and work, in recent years the growth of internet shopping has dramatically changed how we use the city centre and our smaller high streets in local communities. This change has accelerated since the start of the Covid-19 pandemic meaning that we need a greater focus on the vitality of our high streets so that they continue to play an important role in how we live our lives in future during the day and into the evening. Shopping is likely to be just one part of this future – a greater variety of uses need to be included in the future city centre to widen its attractiveness as a destination.

The city centre

- 7.2 One of the key reasons for the success of Exeter is its city centre. The city centre streets and public spaces contain a rich mix of historic buildings, thriving businesses, homes, shops and offices making the city centre a vibrant and bustling place to visit and work. Despite the impact of Covid-19 which has had a very real impact on a lot of cities, footfall in Exeter city centre has recovered well and vacancy rates are low. This reflects Exeter's status as regional centre for a large surrounding area.
- 7.3 However, we need to ensure that the success of the city centre does not stagnate, that it is resilient to withstand future changes without losing its vitality and interest and that it is visited for longer periods of time throughout the day and night. Because we recognise the importance of this issue, one of the key strands of the spatial strategy is to focus development in areas close to the city centre. In addition, the City Council is currently working on a new city centre strategy which will set the direction for the city centre over the coming years, as a place to live, work, shop, study and to socialise. This work is reflected in the Exeter Plan.
- 7.4 Looking forward it will be vital to widen the way the city centre is used. It will need to provide liveable spaces which are attractive and people friendly so that the whole community wants to spend time there. It will need to be effectively connected to the

rest of the city and its neighbourhoods so that people can travel there easily. It will need to be the cultural heart of the city, building on local identity and heritage and providing appropriate venues to enable culture to flourish. It will need to diversify away from traditional retail and cater for the needs of everyone so that the whole community want to spend time there and so that it can respond to future change. And finally, it will need to provide more homes and jobs, reducing the need to travel and making use of the facilities there to provide a genuinely liveable neighbourhood. Policy HS1 sets out the key requirements in order to achieve this successful future for the city centre.

Our district and local centres

7.5 While the city centre plays a crucial, strategic role for Exeter and the wider area, our district and local centres provide the shops, facilities and services which are used by our communities on a daily basis. Our district and local centres are:

District centres

- Heavitree
- St. Thomas
- Topsham

Local centres

- Sidwell Street / Blackboy Road
- Mount Pleasant
- Magdalen Road
- Countess Wear (Topsham Road)
- Beacon Lane
- Polsloe Bridge
- Pinhoe
- Whipton
- Exwick Road / Winchester Avenue
- Isleworth Road

7.6 The large-scale development sites such as Marsh Barton will need to provide for a mix of local facilities alongside housing. As a result, the list of district and local centres may be reviewed in future as these strategic developments build-out.

7.7 Ensuring that these centres continue to thrive will reduce the need to travel and increase the potential for access on foot and cycle. This will mean that the centres will continue to support people in living active lives. They will also need to continue offering local employment and foster strong local identities and community spirit. Finally, the centres will provide easily accessible local facilities to the whole community helping to reduce inequalities.

7.8 The changing way people live their lives and use local facilities will have an impact on how our district and local centres need to evolve over time. Similar to the city centre, these centres will need to provide for a greater variety of uses so they are resilient and can respond to change. On this basis, they will need to provide for more than just shopping. Policy HS1 will enable this greater flexibility over time.

Out of centre retail

- 7.9 During the 1980s and 1990s many towns and cities experienced significant growth in out-of-town shopping centres. This trend allowed customers to travel by car to large stores with lots of parking. This pattern of shopping undermined the success of city and town centres in a similar way to the growth of online shopping. This form of shopping discourages active travel and limits the associated health benefits, it relies on car use which will make achieving our net zero ambitions very challenging, it is very land-hungry and often leads to the creation of low quality places and it can lead to challenging inequalities because of the potential to exclude those groups who cannot afford the costs of car travel.
- 7.10 Policy HS1 recognises these issues and places strict control on the development of retail proposals outside of the city, district and local centres. As set out earlier, the large-scale development sites identified in the plan are likely to require some retail as part of a wider mix of uses.

HS1: The vitality of our high streets

The vitality, viability and resilience of the city centre, district centres and local centres will be maintained and enhanced to contribute to growing prosperity, to provide services which communities need and to minimise the need to travel.

A mixture of uses will diversify the offer of the city centre, extend its hours of activity, enhance the night-time economy, improve its cultural offer and ensure its future resilience as the major centre for the sub-region. Attractive public spaces and high quality provision for active travel and public transport will provide vibrant places for people.

Development proposals in the city, district and local centres for retail, commercial, entertainment, leisure, cultural, hospitality, educational, health, employment and residential uses will be supported where they provide for a complementary mix of uses and enhance the viability, vitality and resilience of those centres.

Large scale retail proposals outside of the city centre, district centres and local centres will not be permitted.



Sustainable transport and communications

Vision - The most active city in the UK

Addressing sustainable transport and communications links to the outcome in the 2040 vision of Exeter being the most active city in the UK. Delivering development in the right locations and with attractive walking and cycling links will maximise active travel and improve health and wellbeing.

Vision - A leading sustainable city

Addressing sustainable transport and communications links to the outcome in the 2040 vision of Exeter being a leading sustainable city. Minimising car use and promoting active travel and public transport will help to achieve the ambition of Exeter being a net zero city by 2030.

Objective: Deliver development in appropriate locations with high quality infrastructure to minimise the need to travel, maximise sustainable transport and support emerging forms of mobility. Helping to deliver the strategic priorities of net zero Exeter by 2030, building great neighbourhoods and promoting active and healthy lifestyles.

Introduction

8.1 The way we travel will be vital to the success of Exeter. It will be central to achieving net zero carbon, growing prosperity, healthy lifestyles and improvements to our environment. In future, travel won't just be about whether we walk or drive - digital communications will also be key. The Exeter Plan will need to ensure that the city is resilient to changes in travel, supporting innovative development in the right places, providing real options and promoting fresh approaches to transport.

Sustainable movement

8.2 Addressing development and travel in Exeter requires joined up thinking and aligned policies. The City Council is working with partners including Devon County Council as the Local Transport Authority to ensure we have consistent aspirations and approaches. This means that the content of the Exeter Plan, the Exeter Transport Strategy and the emerging Local Cycling and Walking Infrastructure Plan and Bus Service Improvement plan are consistent.

8.3 Policy STC1 on sustainable movement sets out an overarching approach to ensuring development and transport work together to achieve the ambition of being a net zero carbon city by 2030, support growth, improve accessibility and enhance the local environment. It identifies the importance of locating development in appropriate locations to minimise the need to travel and achieve 20 minute neighbourhoods (ten minutes each way) then sets out a hierarchy which priorities active travel (walking and cycling), public transport and shared mobility (for example car clubs and cycle hire) over traditional highway improvements for private car use. This will mean that in future, travelling by sustainable modes will be more attractive than travelling by car.

8.4 The focus on travel and health is shown through Exeter's inclusion in a Sport England Delivery Pilot. The public face of this project is Live and Move which is

working with communities to improve health and wellbeing through small changes to people's everyday lives.

- 8.5 All these strands come together and aim to achieve a goal of 50% of trips between home and work in the city being taken by active travel. This is a shared ambition with Devon County Council.
- 8.6 On a more strategic level, we also need to recognise the important role which Exeter plays as a gateway to the national transport network with the two mainline railways lines, trunk road network and links to Exeter Airport in East Devon. Investments in these important networks will be required to maintain the role of city as a regional hub. Thinking about the impact of aviation in terms of achieving net zero will be a significant challenge but will need to be recognised and addressed in the period up to 2040.

STC1: Sustainable movement

To help achieve a net zero city by 2030, to support the sustainable growth of Exeter and to improve accessibility, health and the environmental quality of the city, the following outcomes will be sought from all relevant planning decisions:

1. Delivering on the spatial strategy by supporting development in locations which reduce the need to travel and maximise walking, cycling and public transport for the majority of everyday journeys.
2. Providing for mixed-use development which enables communities to access most of their daily needs within a 10 minute walk or cycle ride from their home.
3. Supporting a healthy, active city through the transport hierarchy by delivering a prioritised and integrated network of active travel links to provide coherent, direct, safe, comfortable and attractive routes for walking, cycling and emerging modes.
4. Achieving a reliable, low-carbon, frequent and attractive standard of public transport within the city and to key destinations.
5. Enhancing transport choices and alternatives to car ownership by expanding shared mobility and requiring its provision in all suitable developments and by supporting innovations including a single ticketing system combining low emission modes.
6. Protecting and enhancing the function of Exeter as a strategic rail, road and air hub through investments in critical infrastructure.

Transport and new developments

- 8.7 Minimising the need to travel will be a vital part of creating attractive places, meeting our net zero ambitions and supporting healthy lifestyles. New development will need to be provided in a way which plays its part.
- 8.8 Policy STC2 covering active and sustainable travel explains what new development will need to look like and what it will need to provide to make it easier for people to walk, cycle or use public transport and shared mobility (e.g. by using car clubs). Development will need to be laid out to enable attractive and direct access by walking, cycling and public transport. Parking will need to be provided in a different way to reduce the dominance of cars and prioritise conveniently located cycle parking

for all dwellings and in public spaces. Appropriate charging points will be needed for the growing number of electric cars and bikes. Road widths and bus stops will need to allow buses to navigate development easily without delays. Infrastructure for shared mobility will be required to enable people to access transport in a different way.

- 8.9 An evolving approach to planning for people's travel needs will mean that in some cases, depending on the location, type and scale of development, there will be opportunities for car-free development and this will be supported where appropriate.
- 8.10 Active travel and public transport provision will generally be prioritised over traditional highway improvements which provide additional road capacity. This will redress the balance between modes. However there will be cases where highway improvements are required. These may include widened vehicle access points, localised junction improvements, measures to improve safety and highway network resilience. In addition, developments should incorporate active design principles and roads should prioritise active and public transport in accordance with approaches set out in Manual for Streets and the Sport England Active Design Guidance.
- 8.11 Overall, transport provision within new development will need to support the creation high quality places whilst providing inclusive and accessible environments that take into account the needs of the whole community, including disadvantaged groups.

STC2: Active and sustainable travel in new developments

To help achieve a net zero city by 2030, to support the sustainable growth of Exeter and to improve accessibility, health and the environmental quality of the city, development will be required to make provision for the following in sequential order:

1. Provision for active travel by:
 - a. Ensuring a prioritised, dense and permeable network of coherent, direct, safe, comfortable and attractive walking and cycling routes within developments and connecting into the wider active travel network.
 - b. Delivering early development phases as close as possible to existing walking and cycling routes and making walking and cycling improvements in the early phases of development.
 - c. Creating an environment which is safe and attractive to pedestrians, cyclists and users of emerging modes of transport.
 - d. Including secure private cycle storage for all dwellings and secure public cycle parking including for e-cycles.
2. Provision for public transport and shared mobility by:
 - a. Ensuring densities, layouts and design which allow the provision of prioritised, frequent, reliable and attractive public transport services to, and where relevant, within the site.
 - b. Delivering appropriately located bus stops, with raised kerbs for easy bus access and, where appropriate, suitable routes for bus priority.
 - c. Allocating spaces for shared mobility vehicles including car clubs and e-bikes in central and accessible locations.
 - d. Supporting new local multi-modal transport hubs, interchanges and local cargo facilities making best use of existing bus, rail and walking and cycling routes.
3. Provision for electric vehicles by:

- a. Ensuring access to electric vehicle charging points for occupiers of all major development
 - b. Delivering additional public charging points within the development.
4. Provision of highway enhancements where they are necessary for safety, where they promote an overall reduction in car journeys, where they make improvements to the local environment or where they are required to enable access to a development site.
 5. Provision of local road improvements only where severe development impacts on the transport network cannot be avoided by the active and sustainable travel investments proposed with the development.

Proposals for car-free development will be supported when accompanied by an appropriate assessment of transport demand and impact.

Active travel proposals

- 8.12 The Exeter Transport Strategy includes an ambitious aim for 50% of work trips originating in Exeter to be made on foot or by cycle. On this basis, a series of specific schemes will be required to support walking and cycling meaning that walking and cycling becomes a more attractive option. Policy STC3 identifies a set of key proposals including the Exeter sections of long distance strategic trails. It also includes a list of important routes within the city as identified in Devon County Council's emerging Local Cycling and Walking Infrastructure Plan. These routes should be part of wider projects to improve the street scene and public spaces.
- 8.13 It is also important to recognise that there are some significant barriers to walking and cycling in Exeter which mean that routes are less direct and journeys take longer. These barriers are sometimes roads, large junctions, the river or the canal. Improvements will be needed to overcome some of these barriers while making the most of the river and canal in terms of active travel. Improvements will also be made to support access to the Green Circle which is a fantastic asset in bringing nature into the city and to the local population.
- 8.14 Although the policy includes a list of specific projects, development will also need to ensure that active travel is provided for comprehensively. Development should be designed to prioritise walking and cycling with active travel considered at the outset. Travel planning will also be needed to support people in making sustainable transport choices as they move into new developments.

STC3: Active travel proposals

Exeter City Council will work with partners to prioritise and improve the active travel network by:

1. Safeguarding the Exeter sections of, and future links to, the following long distance strategic trails:
 - a. Clyst Valley Trail: Killerton - Exe Estuary
 - b. Boniface Trail: Crediton – Exeter
 - c. Exe Cycle Route and Exe Estuary Trail: Exeter – Exmouth/Dawlish
 - d. Routes to Broadclyst, Cranbrook, Woodbury, Kennford, Shillingford Abbot and Shillingford St George
2. Creating inclusive, coherent, direct, safe, comfortable and attractive walking and cycling environments through place-making, enhancements to the public realm, street planting, improved air quality and the reduced dominance of cars. This includes improvements to the following areas:
 - a. City centre streets, including South Street, Fore Street, Paris Street, Queen Street, Sidwell Street and Barnfield Road.
 - b. Routes to Heavitree High Street
 - c. Cowick Street
 - d. Magdalen Road
3. Extending the provision of a comprehensive walking and cycling network within Exeter. This includes the following strategic cycle routes:
 - a. St David's - University of Exeter - Redhayes Bridge
 - b. City centre - Heavitree - Redhayes Bridge
 - c. City centre - Wonford - Newcourt – Topsham
 - d. Pennsylvania - Polsloe Bridge - Heavitree - Wonford - River Exe
 - e. South West Exeter - Alphington - City centre
 - f. River Exe – City centre
4. Addressing existing severance challenges caused by the M5 and A30, the former Exeter bypass, Western Way, key junctions including Exe Bridges, South Gate, Paris Street roundabout, Sidwell Street/Blackboy Road roundabout and Countess Wear, railway lines, the River Exe and the Exeter Ship Canal.
5. Improving the Green Circle and routes to it.
6. Requiring major developments to provide prioritised links to the walking and cycling network with provision in the early phases of development.

Public transport

- 8.15 In addition to active travel, public transport will be vital to provide a real alternative to using the car. Exeter already has an efficient and attractive bus network which provides regular and reliable services across the city whilst the new bus station in the city centre has improved the passenger experience. Buses are complemented by an efficient and widespread rail network with two mainlines and two branch lines which have been supported by new stations including Marsh Barton which is on track to open in the next six months.

- 8.16 Working with Devon County through the Devon Metro concept and a bus service improvement plan, Policy STC4 promotes a number of public transport proposals. For buses, these include strategic bus improvements on the main corridors into the city, the provision of electric vehicles and park and ride/park and change facilities. For rail, the policy continues the longstanding support for another new railway station at Monkerton, improving St David's station so that it provides a fitting arrival point for the city and widespread accessibility improvements to city stations. Working with partners, the City Council will support greater integration of transport modes, including bus, rail and shared mobility (such as car clubs and e-bike hire) through smart and integrated ticketing systems.
- 8.17 The spatial strategy has a key role in ensuring widespread use of public transport by focusing development close to existing services. Development must also provide the improvements needed to enhance our networks and improve transport choice. This will help us deliver on our net zero ambitions, enhance health and wellbeing and improve accessibility for all communities.

STC4: Public transport proposals

Exeter City Council will work with partners to improve the public transport network by:

1. Enhancing bus provision in the city:
 - a. On the Exeter Central corridor between Heavitree and the city centre
 - b. On the Exeter Northern corridor between New North Road and the city centre
 - c. On the Exeter Eastern Corridor between Pinhoe Road and the city centre
 - d. On the Exeter western Corridor between Cowick Street and the city centre
 - e. On Topsham Road
 - f. On Alphington Road
 - g. On Cowley Bridge Road
 - h. By providing cleaner and electric vehicles
 - i. By supporting park and ride and park and change provision serving the key radial routes accessing the city
2. Enhancing rail provision in the city:
 - a. By safeguarding land for a railway station and associated enabling track and signalling infrastructure at Monkerton
 - b. Supporting continued delivery of the Devon Metro programme including at least half hourly frequencies on rail lines into Exeter
 - c. By providing improved interchange facilities at St David's Station
 - d. By improving accessibility and level access at all stations
3. Delivering high quality, multi-modal provision at a series of mobility hubs at key interchanges, in the city centre and at large-scale developments to enable a seamless transition between modes.
4. Supporting the establishment of an integrated ticketing system for public transport and shared mobility.
5. Requiring large-scale developments to contribute to public transport and shared mobility provision in the early phases of development.

Digital communications

- 8.18 Digital communication goes hand in hand with transport provision; people increasingly access services, shopping and work online without the need to travel. The Covid-19 pandemic has accelerated this evolution which means that fast and reliable digital communications infrastructure is increasingly vital to support our communities.
- 8.19 The Government has set out the importance of a new approach to digital infrastructure provision through the UK's digital strategy. This is taken forward at a city level by Policy STC5 which sets out a number of requirements for new development in order to drive better digital communications. Digital infrastructure will need to be planned into new developments from the start and viewed as an essential utility to ensure high quality, comprehensive connections. Open-access ducting will be provided to enable a variety of fibre companies to provide the high quality digital connectivity which communities. The City Council will work digital providers to deliver on these aims.

STC5: Digital communications

To facilitate economic growth, improve accessibility and achieve a net zero city by 2030, Exeter City Council is committed to enabling a step-change in digital communications.

Development and infrastructure which supports the improvement of digital communications, including full fibre connectivity and next generation mobile connectivity, will be supported.

All new major development will:

1. Incorporate digital infrastructure as one of the essential utilities, with routing and phasing planned comprehensively alongside the other utilities.
2. Provide a network of open access ducting (open to all fibre providers) suitable for, and including, full-fibre connections to each building, on first occupation. Ducting must have capacity to accommodate multi-operator fibre connections to the premises to encourage competition and choice for consumers.



Natural environment

Vision – Healthy and inclusive

Addressing the need to protect and enhance the natural environment links to the aim in the 2040 vision of creating a healthy and inclusive city. Protecting the hills to the north and west of the city and the Valley Parks and supporting biodiversity enhancement across the city will help create a healthier and more inclusive city.

Vision – The most active city in the UK

Addressing the need to protect and enhance the natural environment links to the aim in the 2040 vision of creating the most active city in the UK. Protecting the hills to the north and west of the city and the Valley Parks and improving access to natural greenspace including the Green Circle will help create the most active city in the UK.

Objective: Protect and enhance the city's unique natural setting provided by the hills, the valley parks and River Exe, improve access to natural greenspaces and provide net gains for biodiversity. Helping to deliver the strategic priorities of net zero Exeter by 2030, promote active and healthy lifestyles and building great neighbourhoods.

Introduction

- 9.1 The city has a high quality natural environment, with valley and city parks, public rights of way and the Exe Estuary. The hills to the north and north-west of the city give Exeter a distinctive character while the city also contains a rich variety of wildlife habitats. The new Exeter Plan will need to manage development pressures on our local environment to provide benefits for landscape and wildlife, whilst helping us to combat climate change and provide a high quality environment for people to enjoy.
- 9.2 All designations, protected areas and sites mentioned in the policies below will be shown on a Proposals Map that will be available for future rounds of consultation.

Landscape setting

- 9.3 The planning system should enhance the natural and local environment by protecting and enhancing valued landscapes. The hills to the north and west of the city and the connected ridgelines give Exeter a distinctive character. The Valley Parks also contribute significantly to the city's landscape setting.
- 9.4 The new Exeter Plan is supported by the Exeter Landscape Sensitivity Assessment which appraises open countryside within and around Exeter, including the Valley Parks. The appraisal demonstrates that much of the land around Exeter is of intrinsic landscape value. Open land also performs a variety of other roles, including maintaining identity, enabling informal recreation and providing tranquil areas. It contains high quality agricultural land and areas of nature conservation importance. Overall, this land provides the landscape setting for the city and for surrounding areas. It is the combination of these roles, qualities and their importance to the local

population which establishes the unique nature of this land and requires its protection from inappropriate development.

9.5 Policy NE1 provides protection to the landscape setting areas in the city. These areas will be included on a map during future rounds of consultation, however they include the sensitive areas to the north and north west of the city and the Valley Parks. Development within the landscape setting areas should have reference to the Exeter Landscape Sensitivity Assessment and its suitability will be assessed against a series of requirements. These include the need to:

- Protect and conserve the strategic landscape setting of, and backcloth to, the city and where possible enhance it.
- Avoid prominent ridges and slopes and, in particular, steeper slopes.
- Protect, conserve and enhance the existing treed and open undeveloped skylines.
- Avoid breaching skylines with development form, keeping roof lines well below skylines formed by vegetation or landform.
- Conserve and enhance the river valley corridors, their floodplains and their settings including the Exe and the Clyst.
- Protect important views to and from the hills surrounding the city of Exeter.
- Protect the landscape's rural character in close proximity to urban areas by resisting piecemeal urban expansion which undermine landscape patterns and sense of place.
- Protect the character of rural lanes, minimising road widening and signage in association with new development.
- Protect and appropriately manage nationally important historic / archaeological sites and provide interpretation where appropriate.
- Plan for a network of green spaces and green infrastructure links to support the current and future population of Exeter whilst integrating new development into the landscape.

NE1: Landscape setting areas

Exeter's distinctive and valued landscape setting will be protected. Development within the Landscape setting areas will only be permitted where it can be demonstrated that:

1. There is no harm to the undeveloped character, natural beauty or quality of views enjoyed by people within the city; and
 2. There is no harm to the distinctive characteristics, special features and qualities that make this valued landscape sensitive to development;
- or,
3. It is reasonably necessary for the purposes of agriculture, forestry, the rural economy, outdoor recreation, landscape, education or biodiversity enhancement, or the achievement of net zero or the provision of green infrastructure, and it minimises harm to the Landscape Setting Area;
- or,
4. It delivers strategically important infrastructure and it can be demonstrated that there is no suitable alternative site with less harmful impacts and it minimises harm to the Landscape Setting Area.

Valley Parks

9.6 Exeter has seven Valley Parks which provide informal recreation to the public and are also of significant wildlife value. The Exeter Valley Parks comprise:

- Ludwell Valley Park.
- Riverside Valley Park.
- Mincinglake Valley Park.
- Alphington/Whitestone Valley Park.
- Duryard Valley Park.
- Hoopern Valley Park.
- Savoy Hill.

9.7 Many of the Valley Parks (Ludwell, Riverside, Mincinglake, parts of Duryard, and parts of Alphington/Whitestone) are now looked after and managed by the Devon Wildlife Trust. The Riverside and Ludwell Valley Parks Masterplan sets out where new areas of public recreational space can be created, and where improvements to existing space can be made.

9.8 There are also proposals over the future of the former golf course at Northbrook Park. The park creates a link between the two existing Valley Parks of Ludwell and Riverside and there is a lot of scope here for making improvements, for example through the Northbrook wild arboretum project. The Exeter Plan proposes to designate Northbrook as a Valley Park.

9.9 The Valley Parks are distributed throughout the city and their proximity to residents and business areas means that they can be visited at any time of day. As such, they contribute significantly to the quality of life offered in Exeter and enable public access to nature. Policy NE2 seeks to protect the functions of the Valley Parks and ensure that the residents of all new large scale developments have easy and sustainable access to the Valley Parks by walking and cycling.

NE2: Valley Parks

Within the Valley Parks appropriate development which provides for the following functions will be supported:

- Recreation/Suitable Alternative Natural Greenspace
- Nature conservation and enhancement
- Public access by active travel
- Environmental education
- Managing flood risk
- Achieving net zero

Development which is contrary to the Riverside and Ludwell Parks Masterplan, or that would harm existing or potential opportunities for the above functions, will not be permitted.

All large-scale residential development proposals will be required to demonstrate within the submitted Design and Access Statement how residents will access the Valley Parks and if necessary include measures to improve sustainable movement linkages to the Valley Parks and enhance key gateways.

Biodiversity

- 9.10 Exeter is rich in biodiversity. Internationally, nationally, regionally and locally important nature conservation sites in the city support a wide variety of wildlife, including a number of priority species. The protection of these sites is essential and is clearly linked to the city's attraction, sense of place, economy, tourism and general environmental quality. However, biodiversity has declined and to reverse the decline we need to enhance and restore biodiversity across the whole city.
- 9.11 Proposals that have a likely significant effect on internationally important sites (currently comprising Special Areas of Conservation, Special Protection Areas and Ramsar sites) will be subject to an appropriate assessment in accordance with the Habitats Regulations. Where the assessment indicates that it is not possible to ascertain that the proposal, either on its own or in combination with other plans or projects, would have no adverse effect on the integrity of the site, development will only be permitted in exceptional circumstances where there are no alternative solutions, there is an imperative over-riding public interest and compensation measures are secured
- 9.12 Considerable work has been done to avoid any impacts on the Exe Estuary Special Protection Area (SPA) and other nearby internationally important sites from increased recreational disturbance due to new residential development. A mitigation strategy has been agreed working alongside East Devon and Teignbridge District Councils and Natural England. This will be reviewed and updated as we move forward with the Exeter Plan. The strategy has three elements; funding for the management of recreation on the Exe Estuary, the provision of Suitable Alternative Natural Greenspace (SANG), and monitoring of impacts and the effectiveness of measures. These measures are funded by development.
- 9.13 Other areas of particular biodiversity and geodiversity importance include Sites of Special Scientific Interest (SSSIs), County Wildlife Sites and Regionally Important Geological Sites (RIGS).
- 9.14 It is also important to protect and enhance the natural environment which is not designated, including sites of local biodiversity importance. Ecological survey work may be required to establish the potential impact of development on biodiversity.
- 9.15 Under the 2021 Environment Act there is a requirement to produce a Devon Local Nature Recovery Strategy (LNRS). This will set out the priorities and actions required to achieve the Devon Nature Recovery Network. It will also include a map which will show existing habitats and highlight opportunities and priorities. Work on the LNRS will start in summer 2022.
- 9.16 All development proposals will need to provide at least 10% measureable net gains in biodiversity in line with the biodiversity mitigation hierarchy (avoid, then mitigate, and as a last resort, compensate). The biodiversity net gain requirement is set out in the Environment Bill and is due to be a legal requirement by the end of 2023.
- 9.17 Policy NE3 provides criteria to ensure all proposals follow the 'mitigation hierarchy' and provide a net gain in biodiversity.

NE3: Biodiversity

Exeter City Council is committed to increasing biodiversity to help achieve net zero, improve the local environment and enhance health and wellbeing. In order to achieve this, development will be required protect, enhance and restore biodiversity.

Where it is not certain that a proposal would have no adverse effects on an internationally important site, development will not normally be permitted.

Where development is likely to have either a direct or indirect adverse effect on a Site of Special Scientific Interest (SSSI) or on Irreplaceable Habitats (such as Ancient Woodland or Veteran Trees) the advice of Natural England will be taken.

Development that is likely to have either a direct or indirect adverse impact on other known sites of biodiversity interest (including Local Nature Reserve, County Wildlife Sites, Devon Wildlife Trust Reserves, sites identified in the Local Nature Recovery Strategy, or a Regionally Important Geological Site) will only be permitted if:

1. The need for, and benefits of, the development is sufficient to outweigh biodiversity and/or geological conservation considerations;
2. It can be demonstrated that there is no suitable alternative site with less harmful impacts; and
3. Damaging impacts are avoided or minimised and appropriate mitigation and compensatory measures are implemented.

All development will be required to:

1. Follow the mitigation hierarchy;
2. Where relevant, take steps to avoid affecting protected species, and, in all cases, ensure that disturbance to wildlife is kept to a minimum;
3. Preserve, restore and create wildlife habitats, corridors and networks and any other features of ecological interest including those related to protected and priority species in accordance with the Local Nature Recovery Strategy;
4. Where relevant, contribute towards measures to mitigate against adverse effects on the Exe Estuary SPA and other nearby internationally important sites; and
5. Provide at least 10% measureable net gains in biodiversity, on site where possible and elsewhere if not, in accordance with national and local guidance to help deliver the Local Nature Recovery Strategy and to ensure a net biodiversity gain for the city.

Green infrastructure

9.18 Delivering the Exeter Vision 2040 is dependent on fully using the benefits of green infrastructure including improvements to health and wellbeing, air quality, nature recovery and delivering net zero targets, as well as adapting to climate change by providing urban cooling and reducing flood risk.

9.19 A Green Infrastructure (GI) Strategy have been produced for the Exeter area. The strategy sets out a framework to link existing and planned communities through a

coordinated and easily accessible sustainable movement network, together with a biodiversity network that links green and blue (water) assets within Exeter and the surrounding area.

- 9.20 The GI Strategy provides guidance on specific projects as well as providing detailed guidance on frameworks for the strategic growth areas which are reflected in Masterplans. It is important the existing green infrastructure is protected, that enhancements are made and that new green infrastructure is delivered. A review and update of the existing GI strategy (taking account of the new Green Infrastructure Framework and GI standards due to be launched later this year) will be undertaken as we move forward with the new Exeter Plan.
- 9.21 All new large scale developments will need to demonstrate that residents will have easy and sustainable access to green infrastructure by walking and cycling.
- 9.22 Policy NE4 seeks to ensure that development takes a positive approach to protection, enhancement and delivery of green infrastructure.

NE4: Green infrastructure

Development will be required to protect and enhance existing green infrastructure and support the delivery of new green infrastructure in accordance with the updated Green Infrastructure Strategy.

All large-scale residential development proposals will be required to demonstrate within the submitted Design and Access Statement the sustainable transport links to existing green infrastructure, including the Valley Parks and the Exeter Green Circle. Where necessary, contributions to enhance green infrastructure and gateway access points will be sought.



History and heritage

Vision – A liveable and connected city

Addressing the importance of heritage links to the aim in the 2040 vision of creating a liveable and connected city. Protecting and enhancing the quality and accessibility of Exeter's iconic heritage assets will play a key role in providing high quality development, enhancing the local environment and attracting investment.

Vision – City of culture

Addressing the importance of heritage links to the aim in the 2040 vision of being a city of culture. Exeter's rich heritage is fundamental to its identity and culture and contributes towards making the city a desirable place to live, work and visit.

Objective: Protect and enhance the city's unique historic character by promoting development that complements and celebrates the city's heritage, identity and culture. Helping to deliver the strategic priority of building great neighbourhoods.

Introduction

10.1 Exeter's rich historic environment makes the city unique and special and continues to shape the city's culture today. It improves our communities' quality of life and pride in the city and helps to support economic prosperity. New development can raise challenges for our historic environment but the Exeter Plan provides an opportunity to protect and enhance Exeter's historic assets whilst exploring the cultural links and celebrating the contribution of heritage to the character of the city.

Heritage and identify

10.2 Exeter's history is rich and long and the wealth, quality and character of the city's heritage assets help make it a desirable place to live, work and visit. The maintenance and careful management of its heritage is crucial to continuing Exeter's role as a tourist destination and cultural centre as well as ensuring the conservation and future enjoyment of the historic and built environment.

10.3 One of England's oldest settlements with the Cathedral, Roman and medieval remains at its heart, Exeter's iconic heritage depicts its character and its landscape. It is a key part of Exeter's identity and makes an essential contribution to the economy and liveability of the city. The overarching need and desire to respect, protect, enhance and celebrate Exeter's past is crucial to its future.

Heritage assets and future change

10.4 All heritage assets are finite resources that cannot be replaced. Scheduled Monuments, Listed Buildings, Conservation Areas, Areas of Archaeological Importance, and Registered Historic Parks and Gardens are designated heritage assets. There are also non-designated heritage assets that include buried remains,

buildings, parks and gardens of local importance. It is important that the potential impacts on all these assets, whether designated or undesignated, are considered through the planning process. Policy HH1 sets out the key heritage considerations for development in Exeter.

- 10.5 Conservation Areas have architectural and/or historic interest to be conserved and enhanced. Development must seek to manage change in a way that ensures the distinct character and appearance of the Conservation Area, as identified in the City Council's Appraisals and Management Plans, is retained.
- 10.6 Listed Buildings contribute to the character, identity, urban fabric and attractiveness of Exeter. Development proposals must seek to conserve, and where possible enhance, Listed Buildings with reference to what is significant about them, including their special architectural or historic interest, their settings and any special features they possess, both internally and/or externally.
- 10.7 The character and appearance of nationally Registered Historic Parks and Gardens must be conserved, enhanced where possible, and sensitively managed.
- 10.8 Exeter contains several nationally important archaeological sites which are designated as Scheduled Monuments including the City Wall. The historic core of the city has been statutorily designated as an Area of Archaeological Importance (AAI). Separate consent is required for works to scheduled monuments, as is separate prior notification to the City Council for works within the AAI, including for those works normally covered by permitted development rights.
- 10.9 There are numerous other non-designated heritage assets that are not statutorily protected but do comprise an integral part of the city's environment and distinctive character. The significance of these assets is a planning consideration when determining applications.
- 10.10 When considering the impact of development on our heritage, the priority is to retain, re-use and enhance the assets. Where it is not possible to retain the assets, or where there are substantial public benefits that outweigh the loss, provision needs to be made for appropriate recording prior to any alteration or removal.
- 10.11 In addition to protecting and enhancing heritage assets, consideration will need to be given to whether development can improve public access. Development should weave heritage assets into Green Infrastructure and high quality public spaces in order to enhance public enjoyment of the historic environment.

Heritage and net zero

- 10.12 In order to ensure the future of our heritage assets they need to be adaptable to, and protected from, the effects of climate change. In addition, the aim to become net zero carbon requires a collective effort including from historic buildings. This could play a role in fulfilling the wider ambition for Exeter to become a city of heritage innovation.
- 10.13 Responding to the net zero agenda may mean that alterations to historic buildings are required. A holistic view should be taken when considering such alterations. This should balance the need to safeguard the future of the asset and the preservation of its historic and architectural qualities. Alterations to listed buildings should improve energy efficiency, reduce emissions and enable the building to adapt to climate

change while taking considerable care to preserve the historic fabric, character and appearance of the building. This approach is set out in Policy HH1.

HH1: Conserving and enhancing heritage assets

Development proposals will be required to protect and enhance the city's rich heritage, unique historic character, built form, historic landscape, heritage assets, their setting and the cultural offering and identity of the city.

Exeter City Council recognises the value of the City Wall which frames the city centre. Development proposals will be required to protect and enhance this important feature of the city's character and heritage.

Development proposals for historic buildings will be required to minimise carbon emissions and enable the building to adapt to the impacts of climate change while also conserving the significance of the heritage asset.

Development proposals that affect a designated heritage asset will be supported when they conserve the particular significance of the asset in the form of fabric, setting, character or appearance, and any features of special architectural, historic or archaeological interest.

Development proposals that affect non-designated heritage assets, including buried remains and those on the List of Locally Important Heritage Assets, will be required to conserve and enhance the significant elements of these assets, including their physical form and setting.

Where it is not practicable or desirable to retain heritage assets in an unaltered form, whether these are designated or undesignated, provision for appropriate recording, analysis, reporting and archiving will be required in lieu of their retention, to be undertaken by an appropriately qualified person or organisation in accordance with a scheme of works to be agreed in advance of development commencing on site.



Culture and tourism

Vision – City of culture

Addressing the importance of culture and tourism links to the aim in the 2040 vision of being a city of culture. As the city evolves, promoting culture should be embedded in the city's growth, playing a vital role in creating high quality development and raising the profile of the city.

Vision – Accessible world class education

Addressing the importance of culture and tourism links to the aim in the 2040 vision of creating access to world class education and training. Enabling improvements to educational and cultural facilities will support employers to attract and nurture a skilled workforce.

Objective: Explore, enhance and celebrate the cultural richness of the city and its profile as a prominent tourist destination. Helping to deliver the strategic priority of building great neighbourhoods.

Introduction

- 11.1 Culture provides identity and distinguishes one place from another. Exeter is a historic but modern city whose compact size and location means it offers a great balance between urban and rural life. Enhancing Exeter's cultural offering will be key to future success, building the sense of place and belonging in the city. Exeter is committed to being a healthy and active city with culture embedded as standard to enable people to live fulfilled lives. This will help to promote Exeter as a city of culture on the national and international stage.
- 11.2 The Exeter Plan provides for the exploration and celebration of the cultures of the city and our communities as they evolve. Through working in collaboration with the cultural strategy, Creative Arc and the UNESCO City of Literature designation, the Exeter Plan will provide opportunities for engagement with literature, creativity and physical activity in seeking to narrow health inequalities. It will also work together with the skills strategy that identifies the creative industries as important for supporting an environment where creative and cultural activity can flourish.

City of culture

- 11.3 Heritage, sport, art, music and religion interlock as part of the culture of Exeter, shaping the city's identity and character and contributing to the city's prosperity and economic growth whilst also supporting inclusive and healthy communities. The importance of cultural, tourism and artistic opportunities in place-making is essential to Exeter's competitiveness and success in attracting residents, businesses and tourists.
- 11.4 Cultural activity contributes to quality of life and helps to deliver experiences that prompt conversation and reflection, engender debate and critical thinking, and

deepen understanding of the world. These are essential qualities for Exeter to be a sustainable, healthy and inclusive city where everyone thrives.

- 11.5 Exeter's heritage, cultural sector, education institutions, businesses, sports, natural environment and increasingly diverse communities generate a unique sense of place and possibility. They also generate a sense of purpose to face our major challenges.
- 11.6 The Exeter Civic University Agreement establishes how city partners will work together to deliver shared goals on community priorities which highlight an ambitious culture and tourism offer. The City Council, the Royal Albert Memorial Museum (RAMM) and the University of Exeter are working together on a new partnership programme called Creative Arc to create new ideas and projects to address big societal challenges.
- 11.7 The Creative Arc is a cultural partnership that will act as a catalyst for culture-led development and social change. Through knowledge sharing and collaborative working it aims to maximise connectivity with partners across the city and engagement with the community in areas of heritage, regional development, economic regeneration, education, employability and research, attracting significant new investment into the city. It will build on Exeter's profile as a UNESCO City of Literature identifying creativity and cultural industries as important to Exeter's profile and reputation as a liveable city. Work with other key educational partners including Exeter College also promote the importance of cultural activity in creating strong communities.
- 11.8 Public art will be an important way of increasing the cultural offering and interest of the city. It should also be included in the requirements for new developments as set out in the Liveable Exeter principles. The City Council and Exeter Culture are working with the community-based arts organisation, Artwork Exeter, to create a new public art strategy for the city. This will seek to ensure public spaces are designed to engage interest, to be stimulating and unique and act as a focal point to encourage pride of place. It will also recognise that public spaces should be distinctive and special and that public art is a powerful tool in regenerating and celebrating our city.
- 11.9 The public art strategy will inform the Exeter Plan and be a reference point for the requirements of large-scale new developments regarding design and public art, increasing its profile and setting out expectations. All art for the city, including public art, should meet the key criteria of quality, inclusion and sustainability. A shared set of values should be adopted by all partners to foster positive collaborations and partnership working.

Cultural facilities

- 11.10 Exeter has many cultural and tourist facilities and institutions that provide interest, enjoyment and opportunities for enrichment to our communities. These heritage, artistic, literary, musical, sporting and religious facilities are vital to the cultural life of the city and will be protected as set out in Policy C1. Examples of these facilities and bodies which are vital to the city's culture include:
 - The Royal Albert Memorial Museum and its archives
 - The University of Exeter and Exeter College
 - The Northcott Theatre
 - The Barnfield Theatre

- The Cygnet Theatre
- The Corn Exchange
- The Phoenix Centre
- Central Library
- The Cathedral as the heart of the historic city
- A host of places of worship for a variety of religions
- The Underground Passages
- The Custom House
- Roman and medieval remains including the City Wall
- The Devon and Exeter Institution
- Tuckers Hall
- St Nicholas Priory
- Exeter City Football Club
- Exeter Chiefs

11.11 It will be vital to retain viable cultural and tourism uses throughout the city and improve these facilities and assets to develop the city's cultural offering. Development proposals which enhance cultural facilities will generally be supported. In most cases, the loss of existing cultural and tourism facilities will not be acceptable. However, there may be specific cases when the loss of a facility is justified where robust evidence clearly demonstrates a lack of demand and the facility is no longer viable. Applications will need to include such evidence which should reference all possible sources of finance available (including grant funding). Where a cultural facility is not viable, it will also be necessary to demonstrate that an alternative community use would not be viable on the site.

11.12 Cultural and tourism facilities should be accessible through active and sustainable travel to improve health and wellbeing, enhance the local environment and support our ambition of achieving net zero by 2030.

Culture as part of large scale development

11.13 Large scale developments will be expected to reflect local culture and provide high quality public space and public art. The City Council will also support formal and informal arts and cultural activities within shared spaces. These could include creative spaces as part of mixed-use developments or the temporary use of vacant buildings and spaces by creative and cultural organisations, where appropriate.

11.14 Large scale developments should include appropriate cultural and tourism facilities as part of a mixture of uses and within the wider provision of community infrastructure for the local area.

C1: Protecting and enhancing cultural and tourism facilities

Exeter City Council recognises the vital importance of cultural identity to the environmental quality, liveability and economic success of the city.

Development proposals that enhance Exeter's cultural identity and tourist profile will be supported and existing cultural and tourism uses will be retained.

All large-scale developments will be required to demonstrate within the submitted Design and Access Statement how they will enhance local cultural provision and reflect local identity.



High quality places and design

Vision – Liveable and connected

Addressing the need for high quality places and design links to the 2040 vision of Exeter being liveable and connected city. Providing high quality developments, public spaces and infrastructure will improve the city as a place to live, work and visit.

Vision - Healthy and inclusive

Addressing the need to provide high quality places and design links to the 2040 vision of creating a healthy and inclusive city. Attractive places and high quality design provide public spaces, access to nature and opportunities for active travel which improve health and inclusivity.

Vision – A leading sustainable city

Addressing the need to provide high quality places and design links to the 2040 vision of Exeter's potential as a leading sustainable city. High quality places and design support people in adopting more sustainable lifestyles which strengthens the identity of Exeter as a leading sustainable city with vital net zero ambitions.

Vision – City of culture

Addressing the importance of high quality places and design links to the 2040 vision of Exeter being a city of culture. High quality place-making and design will be influenced by the culture of our city to provide attractive environments with a strong identity and communities living lives enriched by cultural activity.

Objective: Deliver the development we need in high quality, liveable, connected places. Helping to deliver the strategic priorities of net zero Exeter by 2030, promoting active and healthy lifestyles and building great neighbourhoods.

Introduction

- 12.1 The quality of the places in which we live and work is fundamental for so many reasons, including to support our health and well-being, attract investment, generate pride in our city and help achieve our net zero ambitions. Development offers opportunities to create high quality places that respond to Exeter's distinct characteristics, reflect local culture and integrate with existing communities, promoting social cohesion and healthy lifestyles.
- 12.2 The Exeter Plan must ensure that development is located in the right place and provides well-designed buildings and spaces. On this basis, development quality is a key part of the spatial strategy which sets out the importance of providing high quality, mixed use development at higher densities to minimise the need to travel and maximise walking, cycling and public transport. High quality places will also be supported by the delivery of a range of infrastructure, an issue which is considered in another section of the Exeter Plan.

- 12.3 Building on the spatial strategy, the Liveable Exeter principles included elsewhere provide more detailed concepts which will ensure that the large scale developments will provide memorable places, outstanding quality, welcoming neighbourhoods, liveable homes, safe and healthy streets and spaces for people and wildlife.
- 12.4 These Liveable Exeter principles for large scale developments have been developed into a series of further design principles which should apply to all developments, requiring high quality development across the board. The emerging Future Place Toolkit will also be important in steering development towards a high quality.

Design principles

- 12.5 Producing high quality places is about more than just providing attractive buildings. It relies on the right uses being located in the right locations. It requires an understanding of how the space will be used by the community. It needs an appropriate amount development for the site. It is based on an appropriate layout, linking to the surrounding area. It is about the spaces and infrastructure which are delivered. And then it is about the specific scale and design of the buildings and how they relate to each other and the public spaces.
- 12.6 Place-making and design is vital at every stage of development. It can only be achieved by considering all relevant issues at the earliest possible stage and by taking a collaborative approach that involves the community and a series of stakeholders.
- 12.7 Ensuring high quality design needs us to look forwards and backwards; there is significant value in both protecting and enhancing what is of historic significance and in recognising Exeter's distinctive character. In addition, it is equally important that development creates new distinctive places which may be seen as of townscape value and historic significance in the future.
- 12.8 Policy D1 sets clear design principles for development and will ensure that planning permission will not be granted for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

D1: Design principles

Planning permission will be granted for development that addresses, where relevant, the following factors:

- Creates high quality distinctive places.
- Ensures the location, layout and built form complement the surroundings.
- Includes a robust and long lasting landscape framework which takes advantage of existing landscape features.
- Contributes to the provision of a compatible mix of uses which work well together to create vital and viable places; retains and refurbishes existing buildings of good townscape value.
- Integrates measures to address climate change in ways which contribute to the character and appearance of the scheme.
- Creates or maintains a high quality public realm and makes provision, where appropriate, for public art as an integral part of the design.
- Ensures that the scale, massing and height of buildings, extensions, and other structures relate well to the site, the surroundings and to human scale.
- Adopts contemporary and innovative design solutions where appropriate.
- Is visually attractive as a result of good architectural detailing and landscaping.
- Uses high quality materials which relate well to materials in the locality.
- Retains and protects existing trees of good arboricultural and amenity value
- Supports the planting of native trees in appropriate locations, including on street; and, integrates all service, utility, extraction systems and refuse facilities so that they complement the scheme.

All development should incorporate principles outlined included in any adopted design-related SPD.



Health and wellbeing

Vision - Healthy and inclusive

Addressing the potential for planning to improve health and wellbeing links to the 2040 vision of Exeter being a healthy and inclusive city. Improvements to active travel routes, creating attractive public spaces, providing access to nature and access to housing and jobs all play a considerable role in improving health, wellbeing and inclusivity for our communities.

Vision – The most active city in the UK

Addressing the potential for planning to improve health and wellbeing links to the 2040 vision of Exeter becoming the most active city in the UK. Ensuring development takes place in appropriate locations, minimises the need to travel and provides routes and infrastructure for walking and cycling will be central to improving health and wellbeing.

Objective: Promote inclusive development which supports communities in becoming healthier and helps Exeter to become the most active city in the UK. Helping to deliver the strategic priorities of net zero Exeter by 2030, promoting active and healthy lifestyles and building great neighbourhoods.

Introduction

- 13.1 Generally, Exeter is a healthy city with a good quality housing stock, a large number of council houses and high levels of employment. Exeter also has high levels of walking and cycling and large areas of accessible green space which support wellbeing. A broad range of health facilities including the Royal Devon and Exeter Hospital and multiple GP surgeries provide access to a health care across the city.
- 13.2 The picture of health and wellbeing is not the same across the city however. People living in its more disadvantaged areas can have comparatively poor health, lower literacy and may experience frailty earlier in life. Although pollution levels in Exeter are low most of the time there are issues of poor air quality in some areas related to the main roads. In some areas and at certain times, crime and anti-social behaviour can be a concern.
- 13.3 The Exeter Plan will play a part in improving health and wellbeing by providing quality housing, supporting job creation, enabling increases in physical activity to get 50 per cent of people walking or cycling to work, enhancing nature, supporting improvements in air quality and supporting the delivery of the health infrastructure we need.

Health and wellbeing

- 13.4 Planning plays an important role in the health and wellbeing of residents. It can promote community inclusion, deliver healthy neighbourhoods, promote active lifestyles, reduce environmental impacts on health and ensure the safety of communities and individuals.

- 13.5 Policy H1 requires development proposals to consider a number of key health and wellbeing priorities at an early stage in the design of larger developments, and to demonstrate how this will be achieved through a health impact assessment.
- 13.6 More details on the key requirements to be considered through the development process are provided below.
- 13.7 Development should promote community inclusion by:
- Delivering a variety of housing tenures and types.
 - Supporting a range of employment opportunities.
 - Avoiding severance (e.g. by a major road that is difficult to cross).
 - Providing local infrastructure such as schools, social care and community facilities
 - Enable good access by active travel and public transport.
 - Provide places and buildings which are accessible to all.
- 13.8 Development should encourage healthy neighbourhoods by:
- Avoiding an over-concentration of hot-food takeaways, particularly along routes to schools.
 - Providing allotments where demand exists.
 - Delivering a range of employment premises to support a mix of jobs and encourage independent stores.
- 13.9 Development should promote active lifestyles by:
- Retaining or providing open, natural and recreational spaces.
 - Providing links to open, natural and recreational spaces.
 - Minimising the need to travel by car.
 - Encouraging walking and cycling away from main traffic routes.
- 13.10 Development should minimise environmental impacts on health by:
- Creating an attractive environment for housing and employment including street trees and other spaces for wildlife.
 - Minimising air and noise pollution and ensure existing sources do not negatively affect residents.
 - Ensuring dust, noise, smoke, light and odours emitted during building works are controlled.
- 13.11 Development should ensure safety and wellbeing by:
- Including appropriate layouts for roads and public space to manage driving speeds and reduce conflict between road users.
 - Design development layouts to provide active frontages and passive surveillance.

H1: Health and wellbeing

Development proposals should maximise opportunities for achieving positive mental and physical health outcomes. In particular, applications for over 30 homes or 1000 sq. metres of floor-space should submit to the Local Authority a Health Impact Assessment demonstrating how the proposal will:

- Promote community inclusion.
- Encourage healthy neighbourhoods.
- Promote active lifestyles.
- Reduce environmental impacts on health.
- Promote safety and wellbeing.

Where any potential adverse health impacts are identified, the applicant will be expected to demonstrate how these will be mitigated.

Developments will make financial payments towards improved health infrastructure commensurate with any additional demand placed on the existing provision.

Proposals for new health care facilities must be easily accessible by public transport and link to walking and cycling routes. Proposals which utilise opportunities for the multi-use and co-location of health facilities with other services and facilities, and thus co-ordinate local care and provide convenience for the community, will be particularly supported.

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Infrastructure and community facilities

Vision - Healthy and inclusive

Addressing the provision of infrastructure and community facilities links to the 2040 vision to create a healthy and inclusive city. Ensuring development is located close to existing local services or delivers new facilities will support health and wellbeing and improve inclusivity.

Vision – A leading sustainable city

Addressing the provision of infrastructure and community facilities links to the 2040 vision of Exeter as a leading sustainable city. The delivery of infrastructure in the right places at the right times helps to address our social, economic and environmental challenges and achieve our net zero ambitions.

Objective: Planning for new infrastructure and facilities at the right time and in the right places and protecting existing services that play an essential role in the lives of our residents. Helping to deliver the strategic priorities of net zero Exeter by 2030, promoting active and healthy lifestyles and building great neighbourhoods.

Introduction

- 14.1 Our communities rely on local infrastructure to live their everyday lives; transport infrastructure helps us to get around, doctor's surgeries provide our health care, schools educate our young people, digital infrastructure helps us to communicate, and greenspace and leisure facilities provide us with the opportunity to relax.
- 14.2 The Exeter Plan will be vital to identify the infrastructure that we need, ensuring it is provided in the right way, at the right time and in the right place.

Delivery of infrastructure

- 14.3 To ensure that all new developments proposed within the Exeter Plan are delivered to a high standard, a wide and varied range of infrastructure will be required. An infrastructure delivery plan lists the infrastructure required to go alongside the developments identified in a plan.
- 14.4 Infrastructure can be funded and delivered in a variety of ways. National policy requires that all new development addresses any anticipated impact on local infrastructure by either providing infrastructure as part of the development, through legal agreements (Section 106) requiring variable financial payments from the developer or via payment of a fixed Community Infrastructure Levy (CIL).
- 14.5 CIL is generally collected when new homes are built and placed into a central Council fund to be used for future infrastructure projects. A review of the CIL charges in Exeter is underway and will be consulted on separately to the Exeter Plan in future.
- 14.6 Key infrastructure can also be funded by grants or loans offered by the Government or directly by external organisations such as Devon County Council, utility

companies, the Environment Agency, National Highways or the Local Enterprise Partnership.

- 14.7 In most cases infrastructure will be funded through significant partnership working with funding coming from a variety of sources.
- 14.8 Policy IC1 sets out the approach to delivering new infrastructure in the city. An infrastructure delivery plan will be prepared to go alongside the next version of the Exeter Plan which will be consulted on in 2023. In addition, more detail about the specific infrastructure and community facilities required to go alongside the various development proposals will be included in future policies for each of the large scale developments and these will be consulted on in 2023.

IC1: Delivery of infrastructure

New development will be supported by the delivery of any associated infrastructure at the earliest practical opportunity, in phases if appropriate. Developer contributions will be sought through the community infrastructure levy and section 106 to ensure that the necessary physical, social, economic and green infrastructure is in place to deliver development.

An Infrastructure Delivery Plan (IDP) will set out the full range of key infrastructure projects that will be required to deliver plan proposals and will be produced for the next version, in partnership with infrastructure providers and other delivery agencies.

Community facilities

- 14.9 Exeter has a wealth of services and facilities that provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. These facilities can be schools, open spaces, allotments, sports pitches, leisure centres or other community facilities such as community halls, churches, libraries, children's centres or youth clubs.
- 14.10 Providing new facilities alongside development proposals will be key to creating a successful, liveable city and making sure that development has a positive impact. Working with our partners will be central to ensuring that essential infrastructure is provided. However, just as important for our residents will be the protection of existing facilities that are already an essential part of their lives.
- 14.11 Policy IC2 sets out the approach for the protection of existing, and delivery of new, facilities in the city.
- 14.12 Cemeteries are also important community facilities. The three cemeteries run by the City Council in Heavitree, Exwick and Topsham are nearing capacity and are likely to be full in the coming years. Future versions of the Exeter Plan will consider this issue in more detail.

IC2: Community facilities

Existing services and facilities that meet the community, social, health, welfare, education, spiritual, cultural, leisure and recreation needs will be protected, unless it can be demonstrated that they are surplus to requirements or sufficient alternative/improved provision is to be provided.

Proposals to provide new or improved services and facilities will be supported.

Facilities that serve the city as a whole should be located in the city centre or, if this is not feasible, at sustainable locations which are readily accessible by public transport, cycling and walking.

Facilities which serve neighbourhood needs should be located within or close to district or local centres or at locations easily accessible to the local community, particularly by foot or bicycle.

Large-scale residential proposals must provide the additional community facilities required to support any additional demand from new residents.

Viability

- 14.13 In order to have an effective plan it is important that its development proposals are viable. Viable means that development can be constructed meeting the planning requirements included in local policy and still allow a reasonable incentive for a landowner to sell, together with a suitable return to a developer.
- 14.14 Planning Practice Guidance identifies that viability appraisal for development proposals is an integral part of preparing a plan. Viability work for the Exeter Plan sites will be done before the next stage of consultation. This will increase the likelihood that policy compliant development will come forward delivering the infrastructure, affordable housing and quality required to provide great places.
- 14.15 Policy IC3 explains the approach that will be taken to considering the viability of development. It recognises that, after the adoption of the Exeter Plan, circumstances could change so significantly that viability may be affected, leading to potential discussions about whether development can afford to fund the infrastructure or affordable housing as required by plan policies.
- 14.16 The policy indicates potential viability changes which may be a considered reasonable in discussions over what infrastructure and affordable housing could be provided by the development. Under these circumstances, a site developer may submit a new assessment of development viability which indicates that a revised approach to the development of the site may be reasonable. This process will need to be carefully justified and comprehensive evidence of viability changes will need to be provided. The proposed viability review mechanism will help to deliver the policy requirements later in the plan period even if they are not provided initially.
- 14.17 As already mentioned, the policy content of the Exeter Plan has not yet been viability tested. Future versions of the plan will be supported by a full viability appraisal.

IC3: Viability

To ensure that developments provide the necessary, planned requirements to create and maintain sustainable communities, deviation from policy requirements on grounds of viability will only be considered appropriate where one or more of the following have occurred to a significant degree following the adoption of the Exeter Plan:

1. Increases in infrastructure or abnormal development costs which could not reasonably have been foreseen at the time of the Exeter Plan's adoption.
2. Adverse changes in building costs relative to sales values.
3. Worsening of local market conditions caused by a recession or an extraordinary event demonstrably affecting incomes and development values.

A viability appraisal of the development proposal will need to be submitted by applicants explaining the circumstances which have led to the changes in viability since the Exeter Plan's adoption. Any variation from the proposed policy requirements, and deviation from the assumption that site-specific infrastructure will be funded by development, will need to be justified.

Exeter City Council will recover from applicants their reasonable costs associated with an independent assessment of submitted viability appraisals where a deviation from policy requirements is sought. The submitted viability appraisal and the independent review will be published by the local planning authority with the planning application documentation.

Where policy requirements are not met due to an agreed viability reason the viability of the proposal will be reviewed every three years in accordance with the requirements of this policy to seek to achieve full policy compliance in later development phases.

Potential development sites

Introduction

- 15.1 The City Council proposes to allocate a series of sites for development between now and 2040. The initial list of potential development sites has been selected in accordance with the spatial strategy set out in Policy S1.

Large scale brownfield sites for mixed use redevelopment

- 15.2 The majority of development is proposed on eight strategic brownfield sites that are located close to the city centre or key public transport hubs with good access to green infrastructure including the Valley Parks. These sites were included in the original Liveable Exeter work and are in multiple ownerships. The City Council intends that these sites are redeveloped to provide high quality, high density, mixed use neighbourhoods that minimise the need to travel and maximise walking, cycling and opportunities to use public transport. The eight sites will make a significant contribution towards meeting our housing requirement and economic growth ambitions (see Policy H1).
- 15.3 These sites will be central to achieving the spatial strategy of the city. The emerging Liveable Exeter principles included in Policy S2 will apply to these sites.

Other residential sites

- 15.4 Twenty other sites are proposed for new housing development. These will make up the balance of our housing requirement and provide for choice and competition in the market place. Most of the sites are small, brownfield sites in line with the spatial strategy. A small number of sites are greenfield but the majority of these are fairly small scale and have good access to transport hubs and/or existing jobs, services and facilities. A number of the smaller brownfield sites are owned by the City Council. Others are owned by other individuals and organisations.
- 15.5 The City Council has identified the proposed site allocations after an assessment process that considered these and other sites across the city. The assessment, which is contained in the Exeter Housing and Economic Land Availability Assessment 2022 (HELAA), looked at:
- Physical constraints such as access, flood risk, topography, ecology, heritage, health and safety issues, contamination, proximity to services, potential infrastructure requirements, ecology, landscape and the presence of trees and hedgerows
 - The availability of land for development
 - The presence of legal covenants or multiple ownership arrangements that could make development so complex as to become unachievable

The potential sites

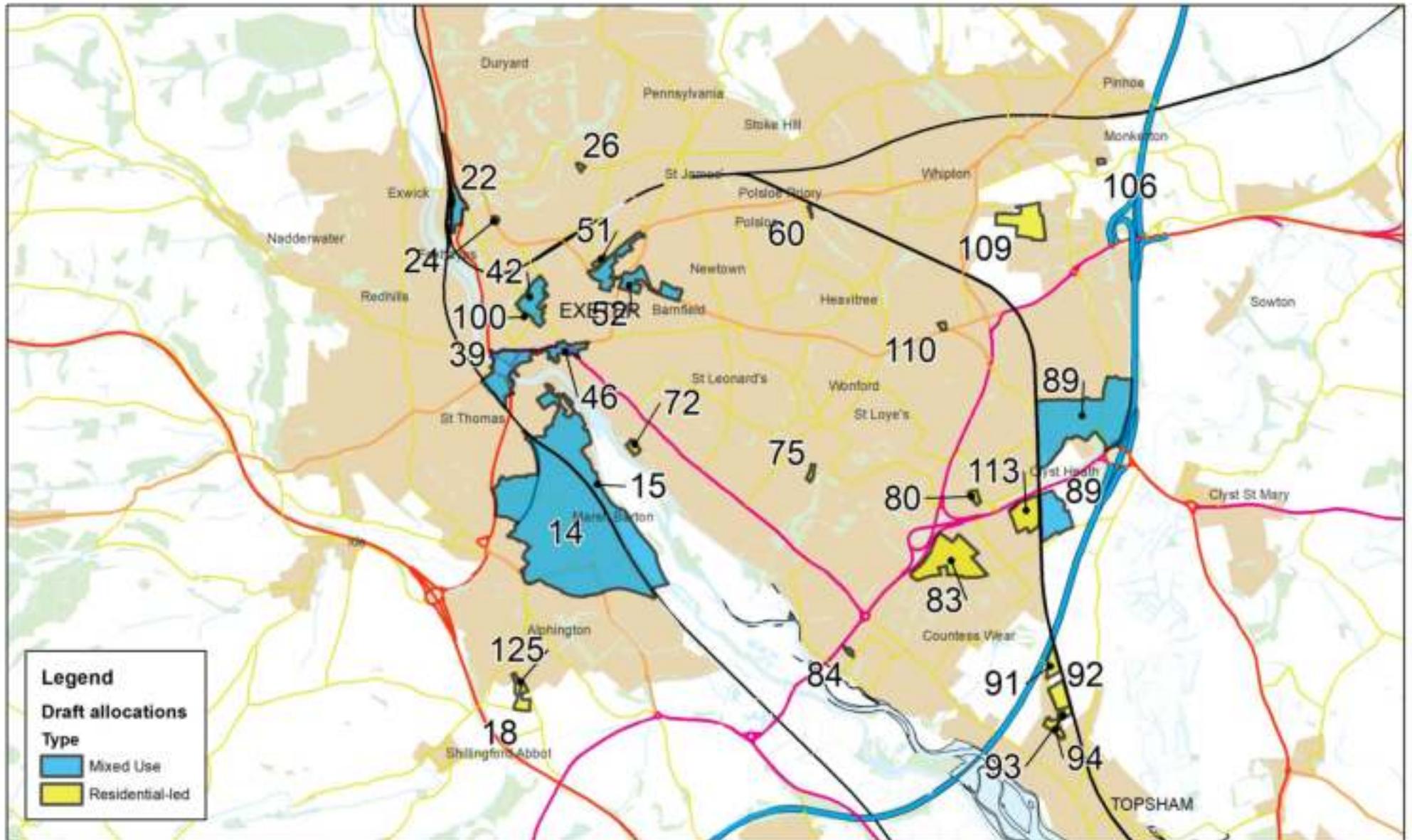
- 15.6 The rest of this section summarises the current characteristics of each site, what types of development they could include and how each site could look like when developed / redeveloped.

- 15.7 The site reference numbers come from the site assessment process.
- 15.8 Looking forwards, significant additional work will need to be progressed to understand the sites better and plan for them in more detail. This will require further studies and significant discussion with partners, stakeholders and owners. The text in this section should not be read as policy; a future version of the Exeter Plan will include policies to manage the future development of the sites. This work will be consulted on in future.

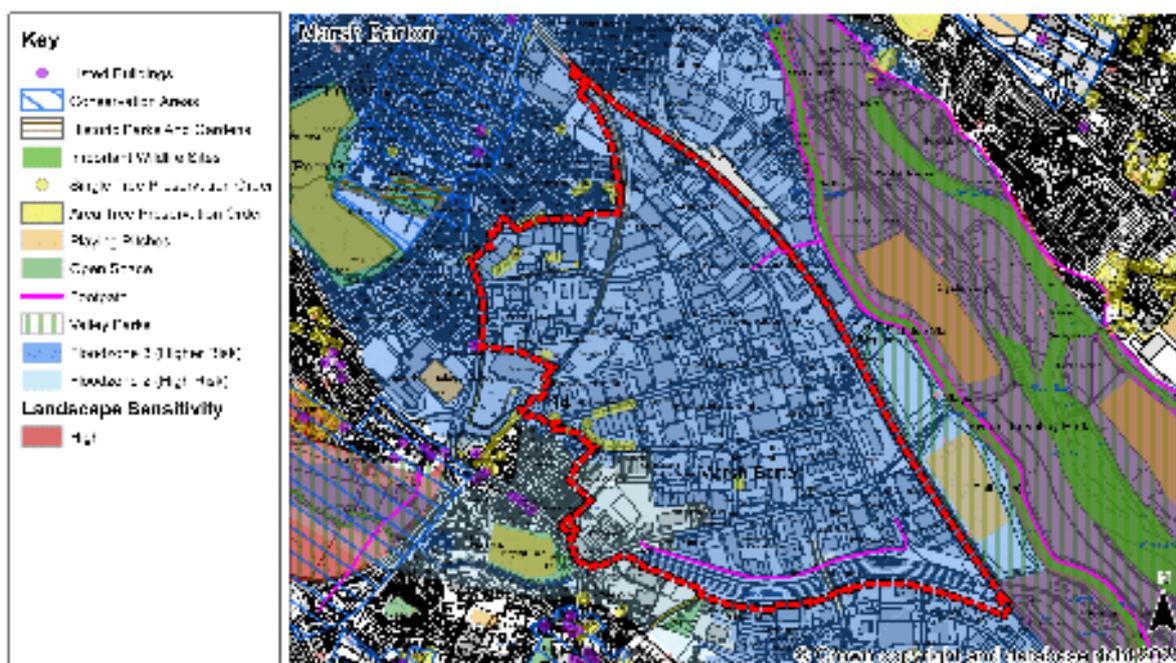
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Map of proposed allocations (figures are reference numbers)

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Marsh Barton – Site Reference 14



What is the site like now?

This large brownfield site in the southwest of Exeter is currently one of the city's main employment areas. Existing uses include light industrial, bulky goods retail, car show rooms and waste management. The site is next to the Great Western mainline and canal/River Exe to the east.

How many homes could be built over the next 20 years?

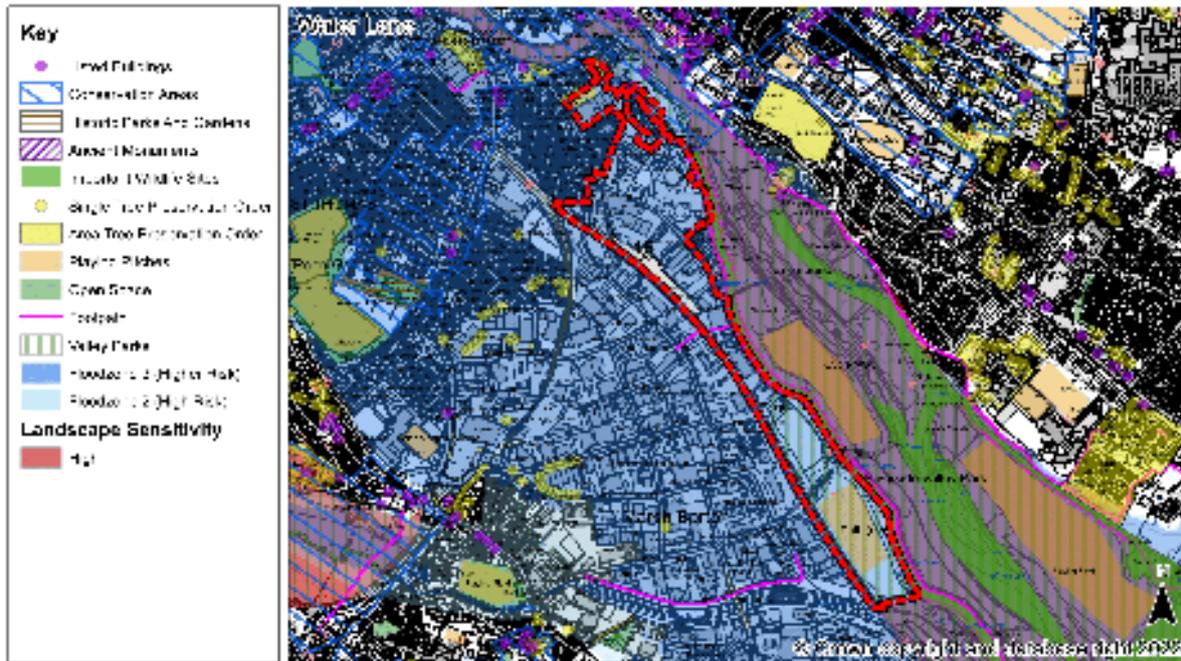
1,880

What might the site be like in the future?

Marsh Barton has the potential to provide a great place to live and work, with development that could include:

- Well-designed, mixed use, net zero new neighbourhoods built at high density, with a strategic approach to flood risk mitigation
- A phased release of land for employment to enable housing and other uses but maintaining appropriate employment provision
- A mix of house sizes and types, including affordable housing
- Low-car (or no-car) residential areas supported by sustainable transport measures including car-clubs, e-bikes, bus services, the new Marsh Barton railway station and some focussed highway junction improvements
- A local centre at the heart of the site, with community facilities to serve new residents including school provision for all ages
- Well-managed public open spaces and green infrastructure/cycling/walking routes linking to the wider city, including over the railway line
- 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
- Phased development that takes account of the energy from waste plant and other waste management uses currently within the site, ensuring their continued operation

Water Lane – Site Reference 15



What is the site like now?

This large brownfield site lies between the Exeter Ship Canal and Great Western mainline. Existing uses include employment (with some buildings in a poor state of repair), retail and leisure, car and coach parking, an old gas holder station, a large electricity distribution station, a biogas power station and Grace Road Playing Field. An area between the power station and playing field has planning consent for a solar farm. Most of the site is already allocated for mixed use redevelopment in the Exeter Local Plan First Review and the Exeter Core Strategy. The City Council proposes that the existing allocation should be expanded in the Exeter Plan to cover the whole Water Lane site.

How many homes could be built over the next 20 years?

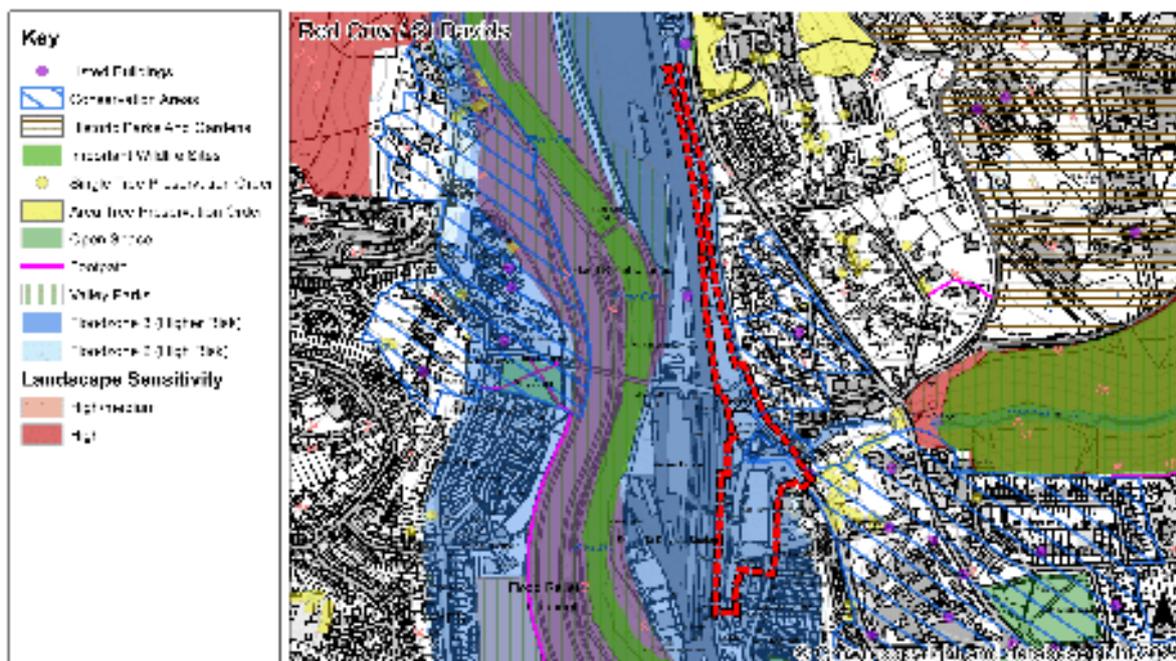
1,180

What might the site be like in the future?

Water Lane has the potential to provide a great place to live and work, with development that could include:

- High quality, high density and net zero design that takes a strategic approach to flood risk mitigation
- A mix of house sizes and types, including affordable housing
- Low-car (or no-car) residential areas supported by sustainable transport measures including new or improved pedestrian/cycle routes (including a new crossing of the Canal), car-clubs, e-bikes, bus infrastructure improvements, the new Marsh Barton railway station, new interchange facilities at St Thomas station and vehicular access
- New workspaces, shops/leisure use, community facilities, potential education provision and well-managed public open spaces
- Ensuring the continued operation of the canal, enhancing its leisure uses and heritage
- Phased development that takes account of the Marsh Barton energy from waste plant and biogas power station, ensuring their continued operation
- 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

Red Cow / St David's – Site Reference 22



What is the site like now?

Red Cow is a brownfield site within Exeter's urban area that includes St David's Station's 'head-house', surface car parks, storage and industrial uses, student accommodation and shops. Cowley Bridge Road and Bonhay Road run along the eastern boundary and the platforms and rail lines of St David's Station lie to the west. Part of the site is already allocated for mixed use redevelopment in the Exeter Local Plan First Review. The City Council proposes that the existing allocation should be expanded in the Exeter Plan, to cover the whole Red Cow site.

How many homes could be built over the next 20 years?

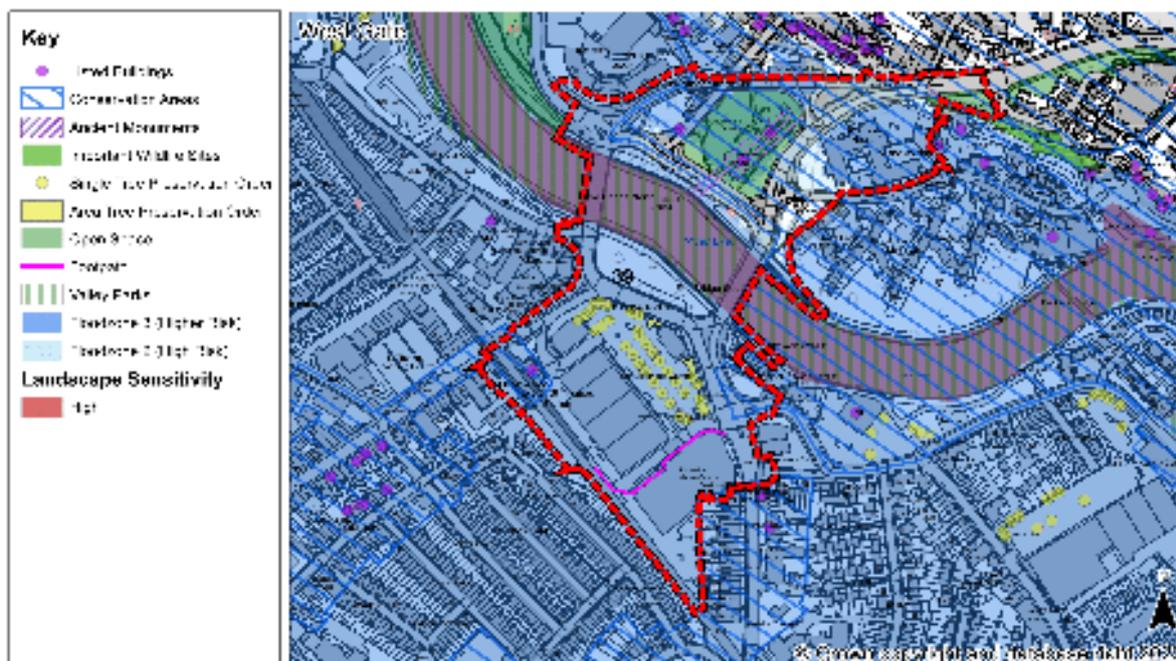
430 (net)

What might the site be like in the future?

The site has the potential to provide a great place to live and work, with development that could include:

- 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

West Gate – Site Reference 39



What is the site like now?

This large brownfield site is bisected by the River Exe and includes the medieval Exe Bridge and surrounding open space, the busy Exe Bridge highway, Exe Bridges Retail Park, Riverside Leisure Centre, land in employment use and part of St Thomas railway station. Part of the site is within the Riverside Conservation area.

How many homes could be built over the next 20 years?

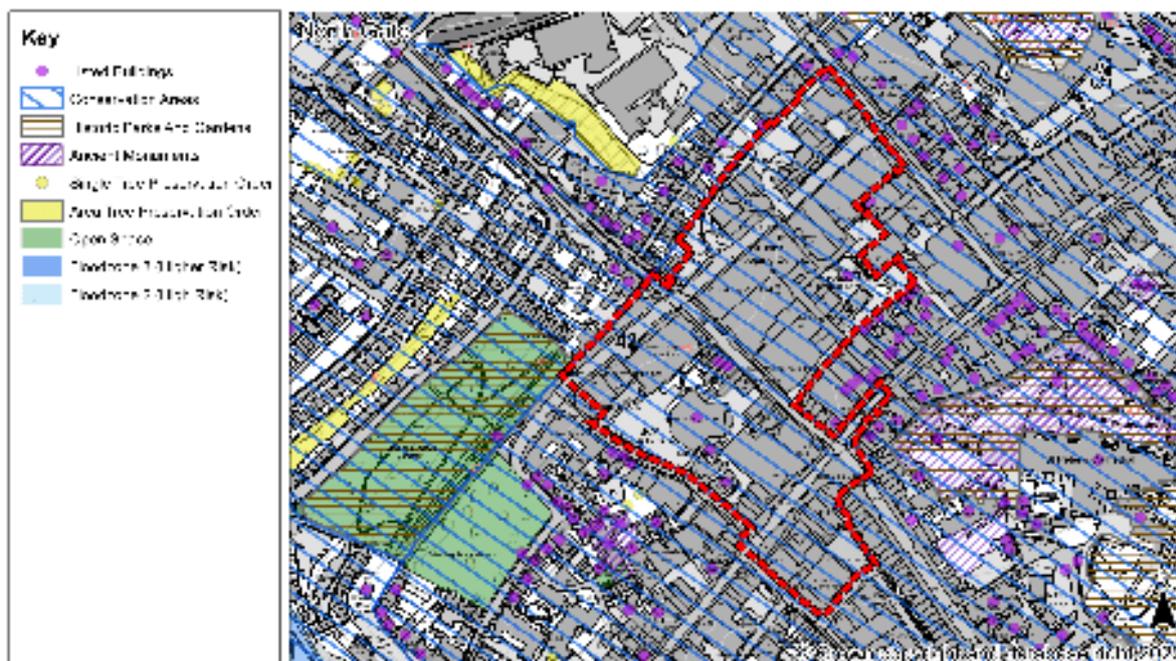
200

What might the site be like in the future?

The site has the potential to provide a great place to live and work, with development that could include:

- High quality, high density and net zero carbon design that takes a strategic approach to flood risk mitigation, improves public access to existing open spaces within the site, carefully respects and enhances its heritage assets, safeguards protected trees, protects 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 supported by more sustainable transport measures including car clubs, e-bikes, improved pedestrian and cycle links to the surrounding area, bus infrastructure improvements and interchange facilities at St Thomas railway station
- Potential wider changes to the highways network
- The retention of Riverside Leisure Centre
- 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

North Gate – Site Reference 42



What is the site like now?

This large, densely developed brownfield site is within the city centre and Central Conservation Area. It includes part of the Guildhall and all of the Harlequins Shopping Centres (the latter set for demolition, with planning consent in place for new homes). It also contains public car parks, a large listed Bingo Hall, smaller scale commercial uses and homes. Paul Street, High Street and North Street run across the site and are important for vehicular movement across the city.

How many homes could be built over the next 20 years?

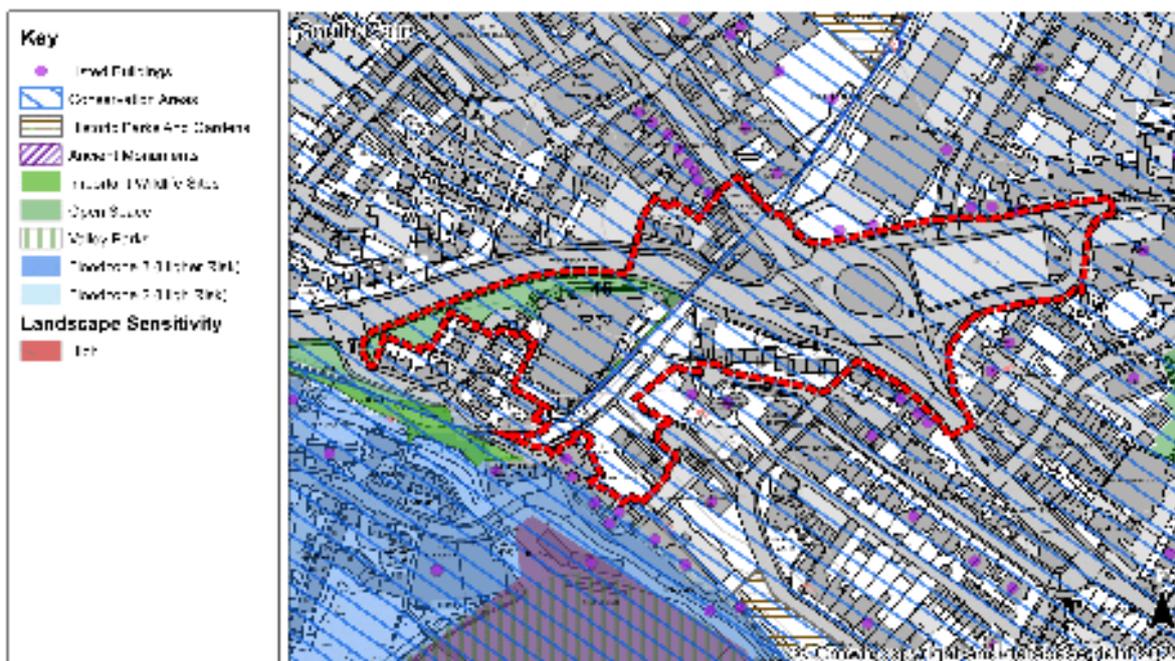
200

What might the site be like in the future?

The site has the potential to provide a great place to live and work, with development that could include:

- The redevelopment of the Harlequins Shopping Centre (as consented) for homes and the regeneration of appropriate parts of the Guildhall Shopping Centre for shops, offices and homes
- High quality, high density and net zero carbon design that celebrates and preserves the site's heritage assets, responds to local surface water flood, respects the amenity of existing homes
- A mix of house sizes and types, including affordable housing, that is low car/car free and supported by more sustainable transport measures including car clubs, e-bikes and improved pedestrian and cycle links to the surrounding area
- Financial contributions towards local health and education services and highways junction improvements
- 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

South Gate – Site Reference 46



What is the site like now?

This site lies on the southern edge of the city centre in a mixed use area. It includes two public car parks, existing homes, a night shelter and a large highways gyratory. Part of the site is within the Southernhay and Friars Conservation Area and part is within the Central Conservation Area.

How many homes could be built over the next 20 years?

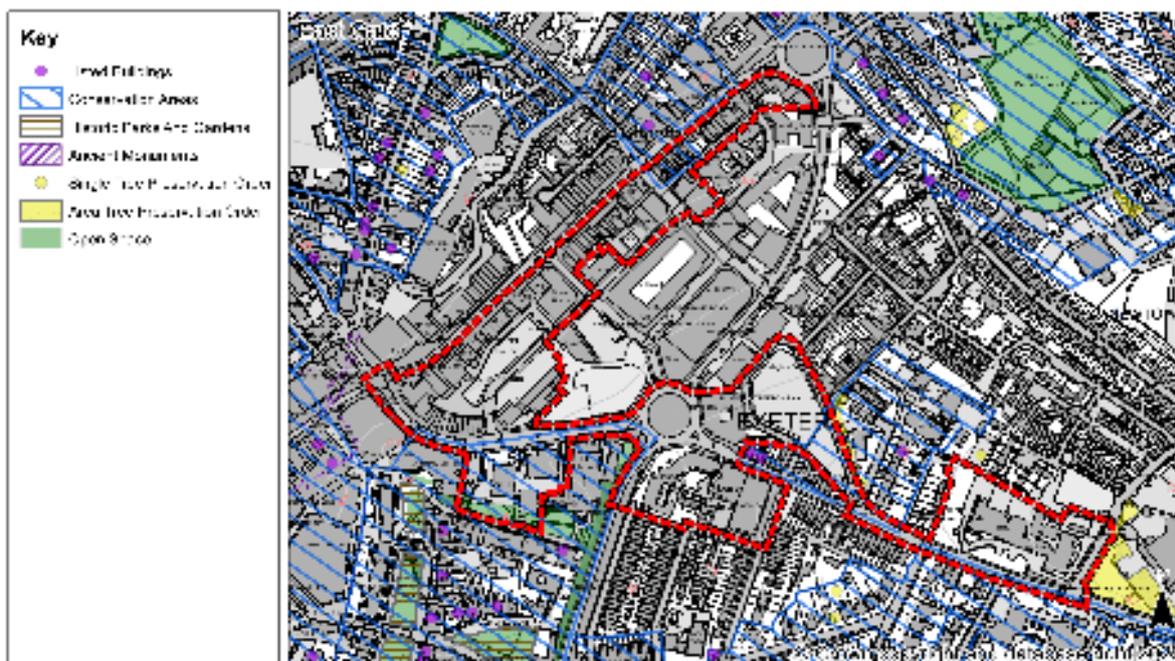
170 (net)

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- Meeting the housing needs of existing residents and respecting their amenity
- High quality, high density and net zero carbon design that carefully respects and enhances the site's heritage assets, responds to localised surface water flooding and significantly improves the appearance of this key gateway to the city centre
- A mix of new house sizes and types, including affordable housing, that is low car/car free and supported by more sustainable transport measures including car clubs and e-bikes
- Significant alterations to the highway that improve pedestrian and cycle access to the city centre and quayside
- Financial contributions towards local health and education services
- 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

East Gate – Site Reference 52



What is the site like now?

This large brownfield area currently contains a mix of city centre uses including retail, leisure, community and employment uses, existing homes, public car parks and the former Police Station and Magistrates Court. Part of the site is allocated for mixed use redevelopment in the Exeter Core Strategy (2006-2026). The City Council proposes that the existing allocation should be expanded in the Exeter Plan to cover the whole East Gate site.

How many homes could be built over the next 20 years?

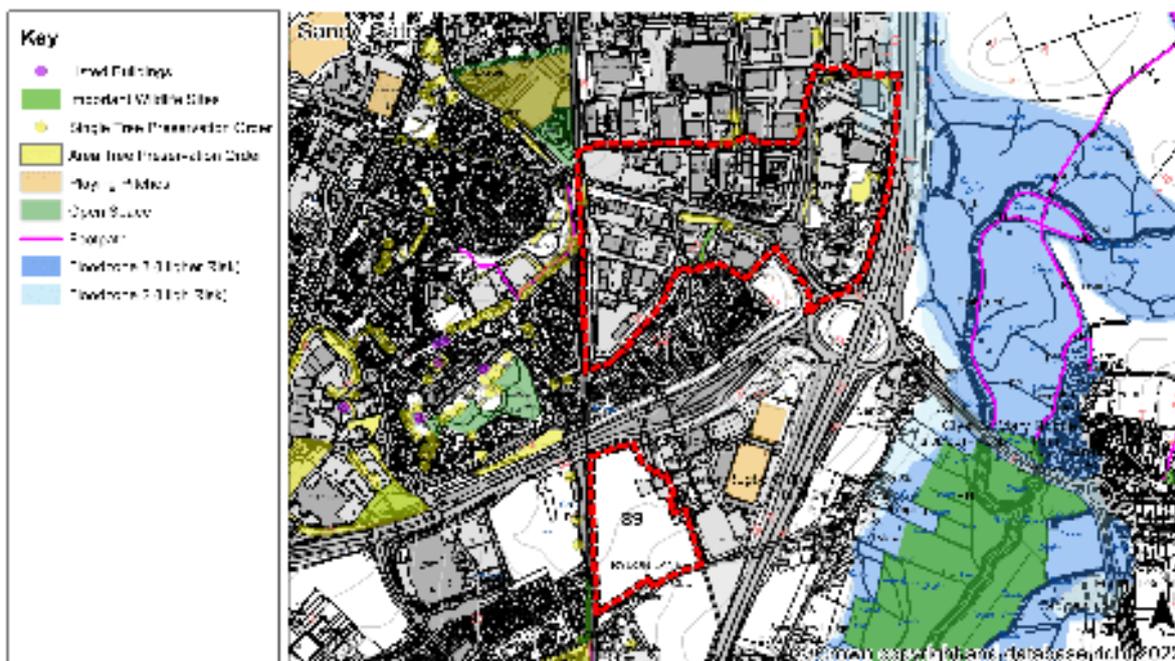
750 (net)

What might the site be like in the future?

The site has the potential to provide a great place to live and work, with development that could include:

- Meeting the housing needs of existing residents and respecting the amenity of residents nearby
- A range of other uses including shops, leisure, community space and employment (including a relocated Civic Centre and Innovation Hub)
- High quality, high density and net zero carbon design that carefully respects and enhances nearby heritage assets, responds to localised surface water flooding and significantly improves the appearance of this key gateway to the city centre
- A mix of new house sizes and types, including affordable housing, that is car free and supported by more sustainable transport measures including car clubs, e-bikes and significant enhancements to pedestrian and cycle routes
- Financial contributions towards local health and education services, utilities, public transport enhancements along Heavitree Road and city centre highway improvements
- 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

Sandy Gate – Site Reference 89



What is the site like now?

This large site lies on the eastern edge of the city close to junction 30 of the M5 and Sandy Park Rugby Ground. Land uses include employment, education, agriculture, retail, a motorway services, hotel and park and ride facility. The area of site to the south of the A379 is already allocated for development in the Exeter Core Strategy. The City Council proposes to carry this allocation forward into the Exeter Plan within the wider Sandy Gate site.

How many homes could be built over the next 20 years?

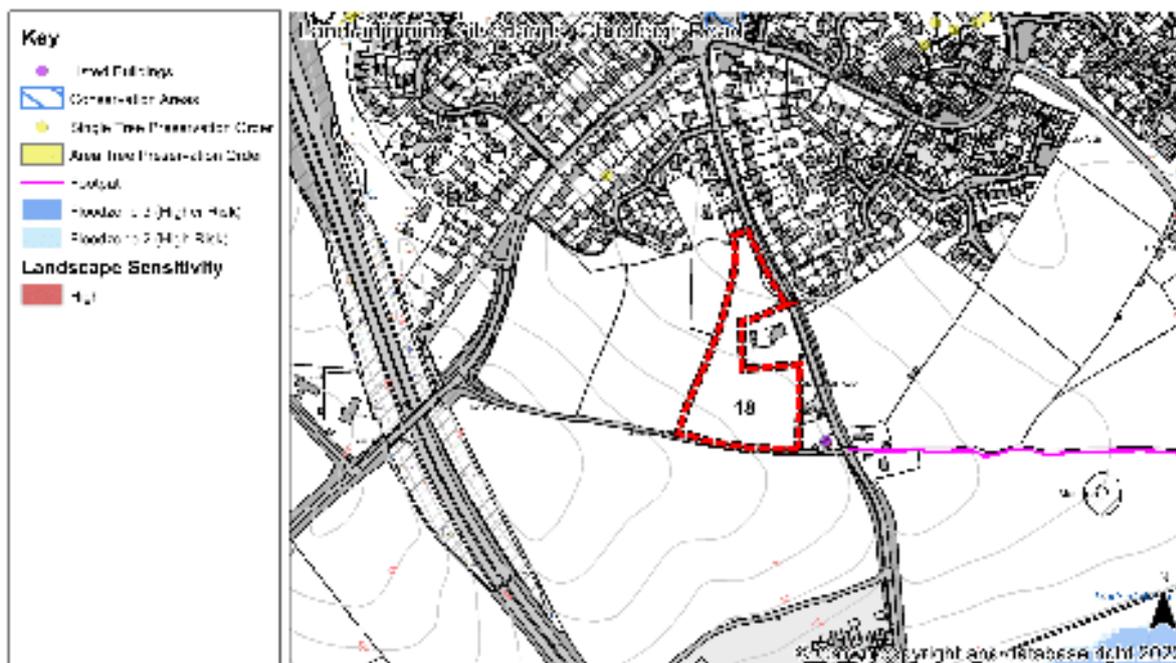
250

What might the site be like in the future?

Sandy Gate has the potential to provide a great place to live and work, with development that could include:

- A phased release of land for employment, to allow for consideration of supply and demand
- Well-designed, net zero carbon new neighbourhoods built at high density, that respect the amenity of residents living nearby, mitigate noise from the M5 and railway and respond to localised surface water flooding
- A mix of house sizes and types, including affordable housing, supported by community and recreation uses
- Low-car residential areas supported by sustainable transport measures including car-clubs and e-bikes and financial contributions to enhance bus routes, improved pedestrian and cycle links to Digby Station and the city centre and transport interchange facilities.
- Retention of park and ride capacity, either within the site or close by
- Consideration of the future of the motorway services and potential provision elsewhere in the area
- Potential highway enhancements to Junction 30/Sandygate roundabout
- 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

Land adjoining Silverlands, Chudleigh Road – Site Reference 18



What is the site like now?

This greenfield site is located on the edge of Exeter to the south of Alphington and is currently used for agriculture. It is already allocated for development in the Exeter Core Strategy and the City Council proposes that it should be re-allocated in the Exeter Plan. The fields to the west and east of the site have planning permission for new homes and land to the south of the site is allocated for development in the Teignbridge Local Plan (2013-2033).

How many homes could be built over the next 20 years?

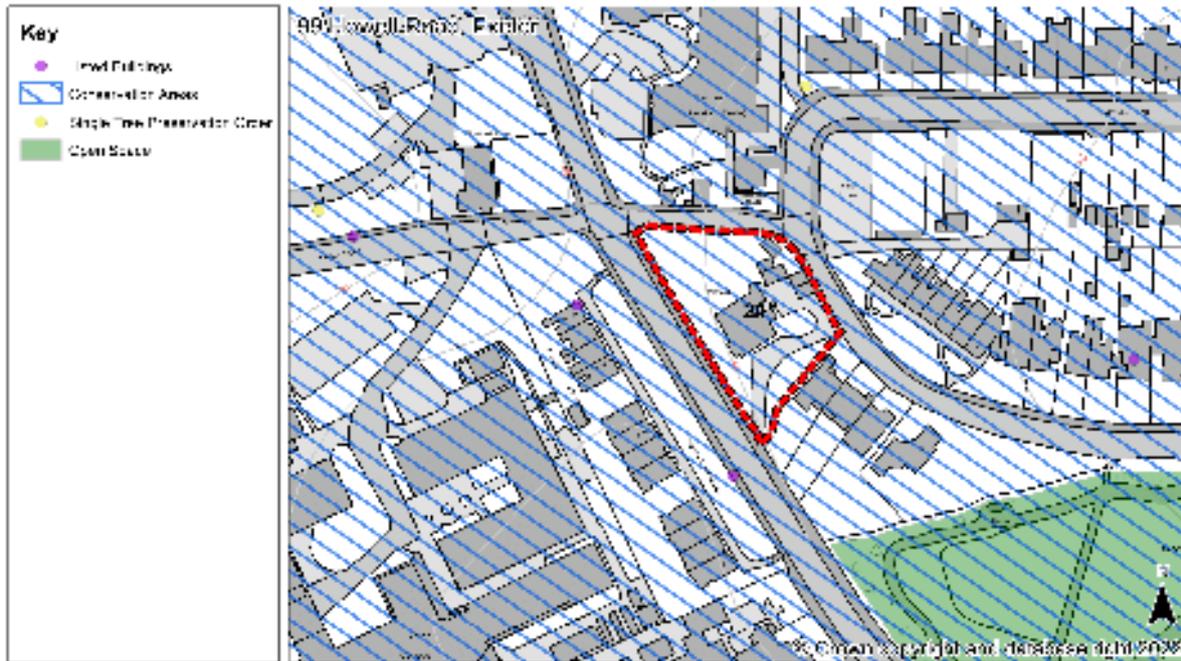
37

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- High quality and net zero carbon design that takes into account the site's biodiversity assets, respects the amenity of neighbouring homes and preserves the setting of the nearby Grade II Listed Building (The Gables)
- A mix of house sizes and types, including affordable housing
- New or improved pedestrian/cycle links with the surrounding area
- Well-managed public open spaces
- Financial contributions towards local health, education and public transport services
- 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

99 Howell Road - Site Reference 24



What is the site like now?

This small site within Exeter's urban area consists of a substantial Victorian detached dwelling (Oakfield) and its garden. The site is within St David's Conservation Area, is surrounded by roads on three sides and slopes down from east to west. The surrounding area is largely residential. The site is within St James Neighbourhood Plan area.

How many homes could be built over the next 20 years?

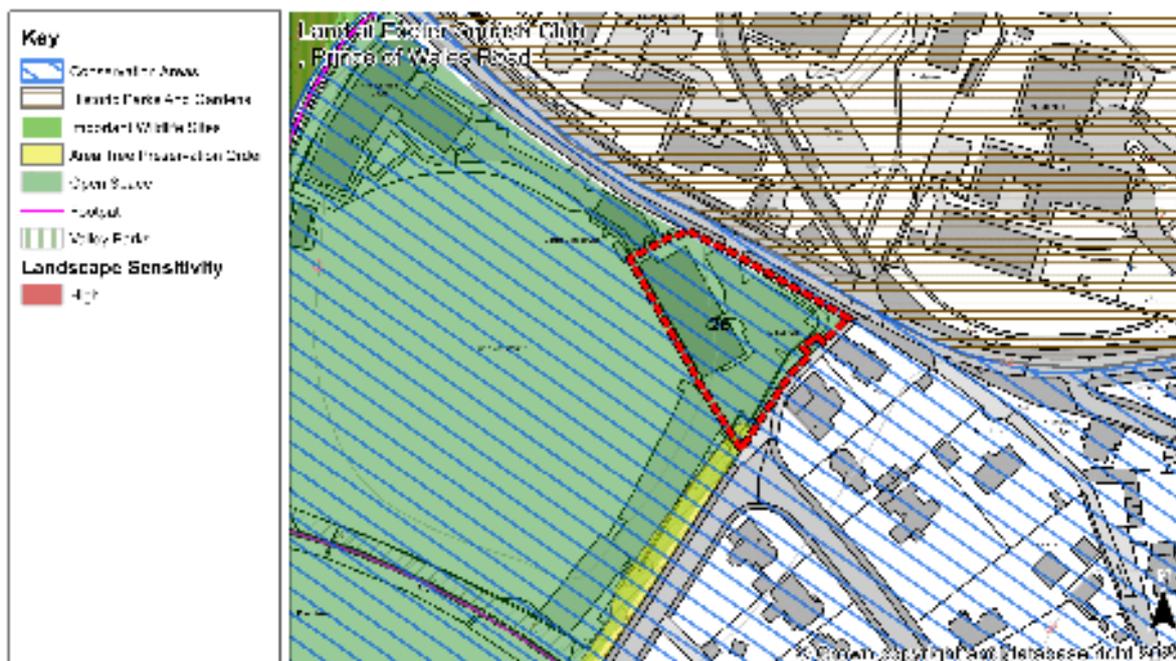
6 (net)

What might the site be like in the future?

The only form of development likely to be acceptable on this site will be the conversion of Oakfield to apartments (including affordable housing). Oakfield has the potential to provide a great place to live, with development that could include:

- A design that is car-free and low carbon, preserves or enhances the site's and neighbouring area's heritage assets, safeguards existing TPO trees on the site and responds appropriately to local surface flood constraints
- Provides for improvements to pedestrian crossing facilities and the Howell Road/New North Road highways junction
- 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

Exeter Squash Club, Prince of Wales Road – Site Reference 26



What is the site like now?

The site is occupied by a building providing squash and racketball club facilities and associated car parking. It is located within the Longbrook Conservation Area. The northern site boundary is formed by Prince of Wales Road and to the west is Exeter Cricket Club's grounds and a recently constructed student accommodation block. The area to the west is primarily residential. Directly to the south of the site is an area of car parking that is used by the Cricket Club. The site is within St James Neighbourhood Plan area.

How many homes could be built over the next 20 years?

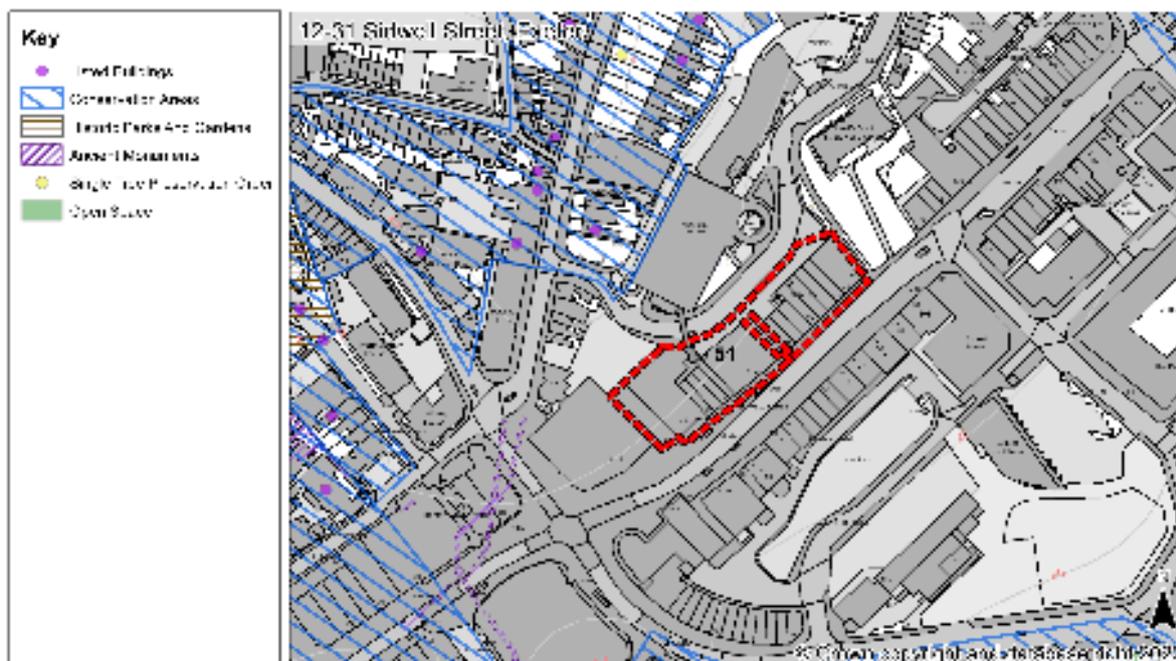
40

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- The re-provision of sports (including squash) and other community facilities on the site
- High quality, high density and net zero carbon design that safeguards existing TPO trees, preserves or enhances local heritage assets, respects the amenity of neighbouring homes and does not impinge upon the continued successful operation of the Cricket Club
- A variety of homes, potentially including purpose built student accommodation or co-living homes, with low level car parking provision supported by more sustainable transport measures including car clubs, e-bikes and improved pedestrian and cycle links to the surrounding area
- Financial contributions towards local health and education services
- 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

12-31 Sidwell Street – Site Reference 51



What is the site like now?

This city centre site comprises a series of post war commercial units with homes and storage above, together with an NHS walk-in-centre. A covered ground floor arcade runs along the site's frontage with Sidwell Street, along which are a number of bus stops. There is a service area to the rear of the properties. The surrounding area contains a mix of city centre uses including commercial, leisure, car parking, community and residential.

How many homes could be built over the next 20 years?

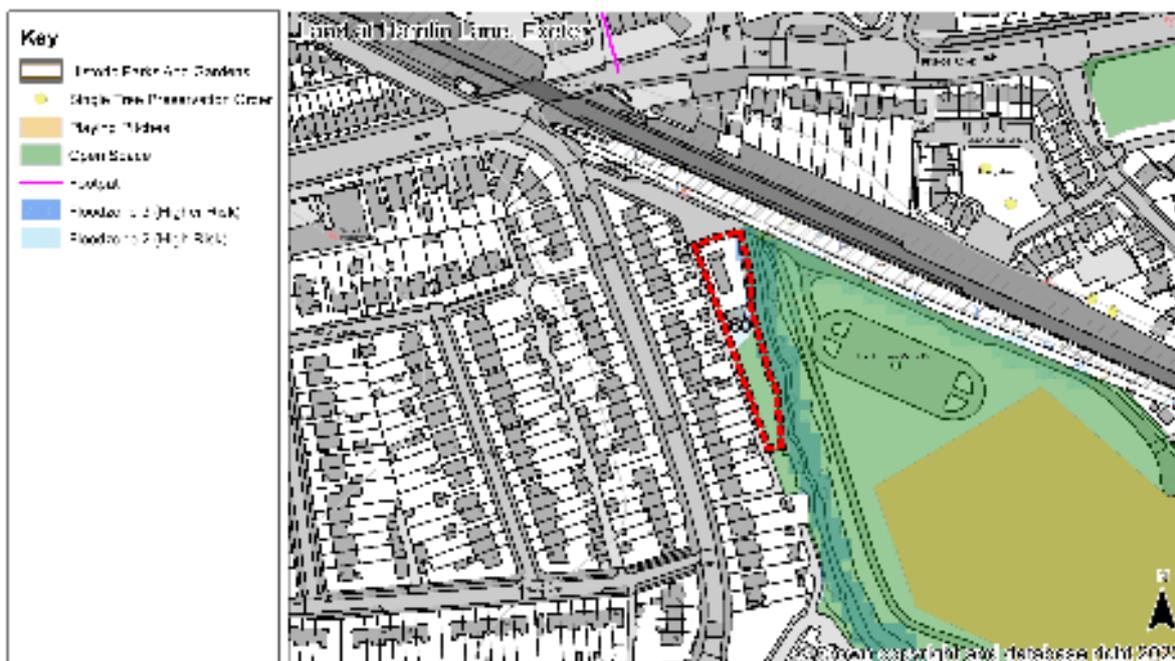
51 (net)

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- High quality, high density and net zero carbon design that carefully respects and enhances nearby heritage assets
- Meeting the housing needs of existing residents, respecting their amenity and providing affordable housing
- The provision of car free/low car homes that are supported by more sustainable transport measures including car clubs and e-bikes
- Retaining city centre uses at ground floor level, including the walk in centre
- Maintaining and improving pedestrian access and bus stop provision along Sidwell Street
- Financial contributions towards local health and education services
- 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

Land at Hamlin Lane – Site Reference 60



What is the site like now?

The site comprises a workshop and associated private garden and is adjacent to the Northbrook and Hamlin Lane playing fields. Polsloe Station is a short distance away, together with a number of shops on Pinhoe Road. The surrounding area is otherwise largely residential.

How many homes could be built over the next 20 years?

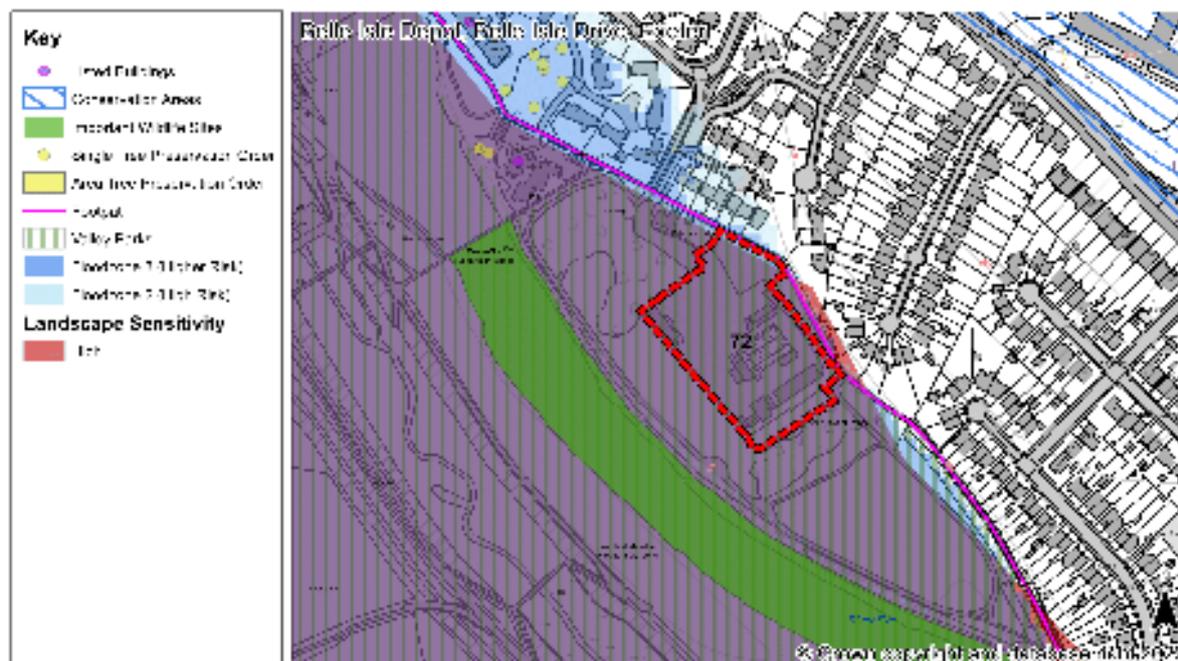
13

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- Respecting the amenity of residents nearby
- High quality and net zero carbon design that responds to localised flooding associated with the Northbrook and surface water flooding and protects important trees
- A mix of new house sizes, including affordable housing, that is car free or low car and supported by more sustainable transport measures including car clubs, e-bikes and enhancements to pedestrian and cycle routes
- Financial contributions towards local health and education services
- 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

Belle Isle Depot, Belle Isle Drive – Site Reference 72



What is the site like now?

This brownfield site comprises a depot station used as a nursery. It is set within Belle Isle Park and the Riverside Valley Park, close to existing homes with very good access to cycle routes.

How many homes could be built over the next 20 years?

33

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- High quality and net zero carbon design that addresses flood risk from the River Exe and surface water and safeguards significant trees flooding associated with the Northbrook and surface water flooding and protects important trees
- A mix of new house sizes and types, including affordable housing, that is car free or low car and supported by more sustainable transport measures including car clubs, e-bikes and enhancements to pedestrian and cycle routes
- Ensuring that the amenity of residents nearby is respected
- Financial contributions towards local health and education services
- 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

Chestnut Avenue – Site Reference 75



What is the site like now?

This site currently contains twelve maisonettes, a fenced-off area of land that used to contain a further two maisonettes, a children's play area and additional public open space. It lies on the edge of Ludwell Valley Park, in an otherwise residential area.

How many homes could be built over the next 20 years?

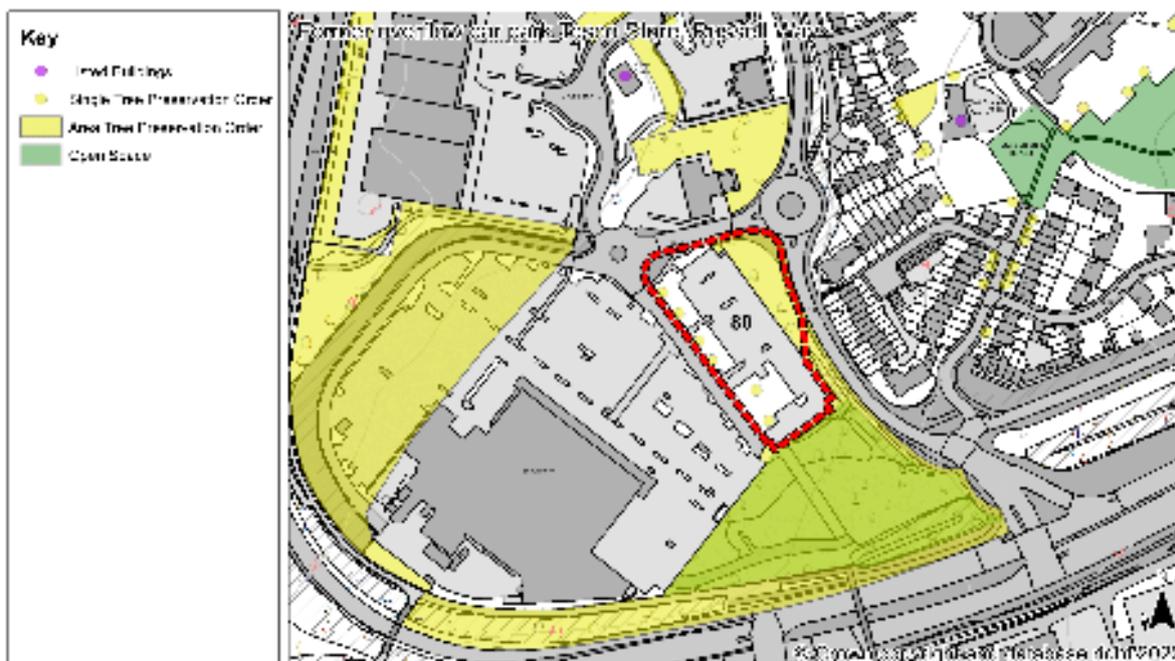
26 (net)

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- Meeting the housing needs of existing residents and respecting the amenity of residents nearby
- A mix of types and sizes of homes, including affordable housing, that are net zero carbon
- Car free or low car, supported by more sustainable transport measures including car clubs, e-bikes and enhancements to pedestrian and cycle routes
- Enhancements to the existing play area and open space
- Financial contributions towards local health and education services
- 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

Former Overflow Tesco Car Park, Russell Way – Site Reference 80



What is the site like now?

Most of this site is occupied by a car park previously used to serve the adjoining Tesco store at peak times. The site slopes steeply at its edge to Russell Way. It is located at the edge of Rydon Lane Retail Park, close to the A379 and existing homes at Digby.

How many homes could be built over the next 20 years?

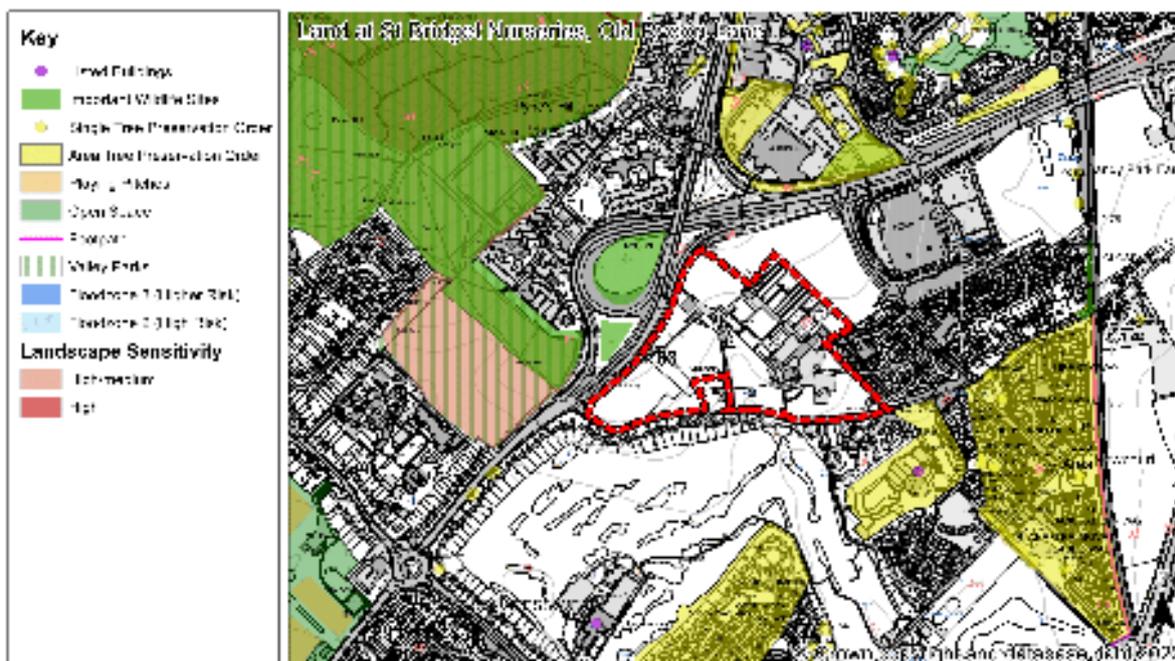
18

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- A mix of types and sizes of homes, including affordable housing, that are net zero carbon
- Net zero carbon and low car homes, supported by more sustainable transport measures including car clubs, e-bikes and enhancements to pedestrian and cycle routes
- Respecting the amenity of residents nearby
- Safeguarding significant trees
- Appropriate highways access including from Tesco's internal road layout
- Financial contributions towards local health and education services
- 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

St Bridget Nurseries, Old Rydon Lane – Site Reference 83



What is the site like now?

This site comprises a nursery and garden centre currently access from Old Rydon Lane, bounded by mature hedgerows and containing a significant number mature specimen trees. It also contains three houses. The site is already allocated for development in the Exeter Core Strategy. The City Council proposes to carry this allocation forward into the Exeter Plan.

How many homes could be built over the next 20 years?

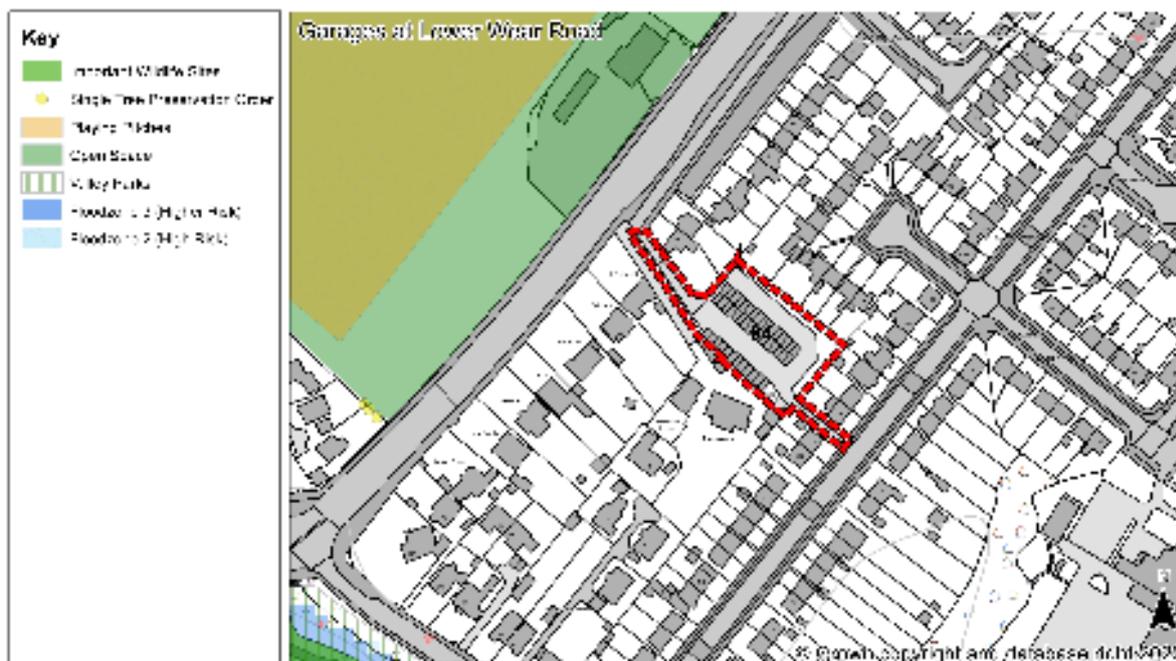
334 (net)

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- Respecting the amenity of residents nearby
- A mix of house sizes and types (including affordable) that are net zero carbon and low car, supported by more sustainable transport measures including car clubs, e-bikes and enhancements to pedestrian and cycle routes
- High quality design that safeguards significant trees and responds to localised surface water flooding
- Public open space and children's play provision
- Primary highways access from the roundabout on Newcourt Way and the potential for Old Rydon Lane to operate as a one-way system from the A379 to Newcourt Way
- Financial contributions towards local health and education services
- 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

Garages at Lower Wear Road – Site Reference 84



What is the site like now?

This site contains garages and hardstanding and is set within a residential area. Highways access is available from Bridge Road to the west and Lower Wear Road to the east.

How many homes could be built over the next 20 years?

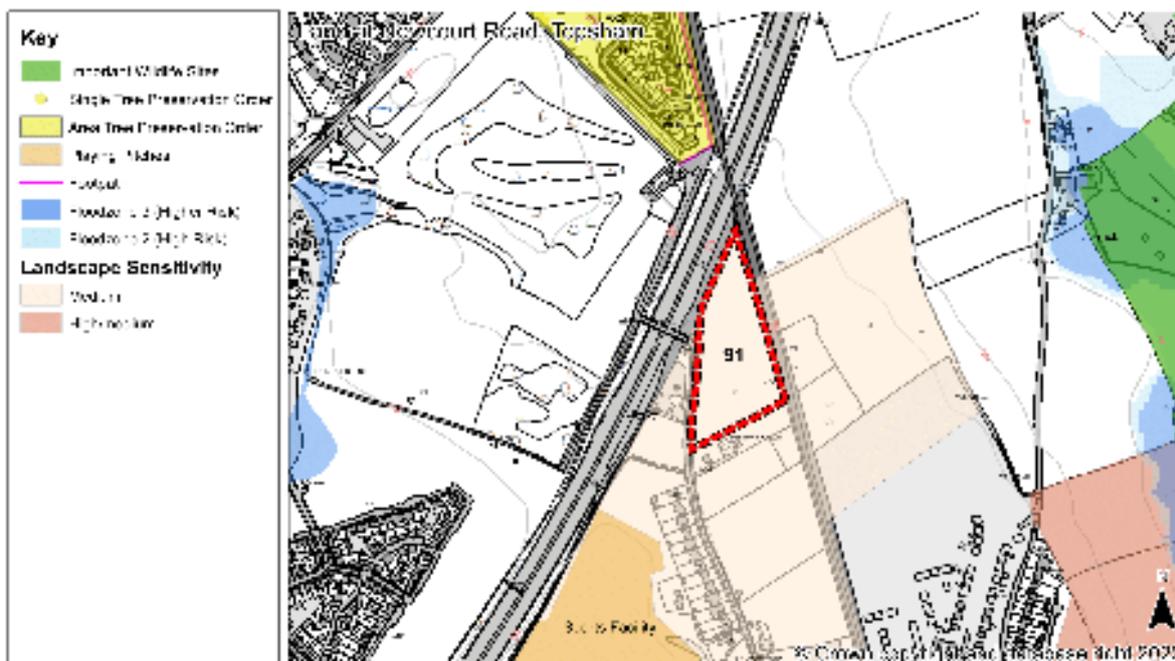
9

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- Respecting the amenity of residents nearby
- A mix of types and sizes of homes, including affordable housing, that are net zero carbon
- New high quality homes that are net zero carbon and low car, supported by more sustainable transport measures including car clubs, e-bikes and enhancements to pedestrian and cycle routes
- A design that responds to localised surface water flooding
- Financial contributions towards local health and education services
- 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

Land at Newcourt Road, Topsham – Site Reference 91



What is the site like now?

This greenfield site lies on the edge of Topsham, at the northern end of Newcourt Road. It adjoins the Avocet railway line, sits above/adjacent to the M5 motorway and is crossed by high voltage power lines.

How many homes could be built over the next 20 years?

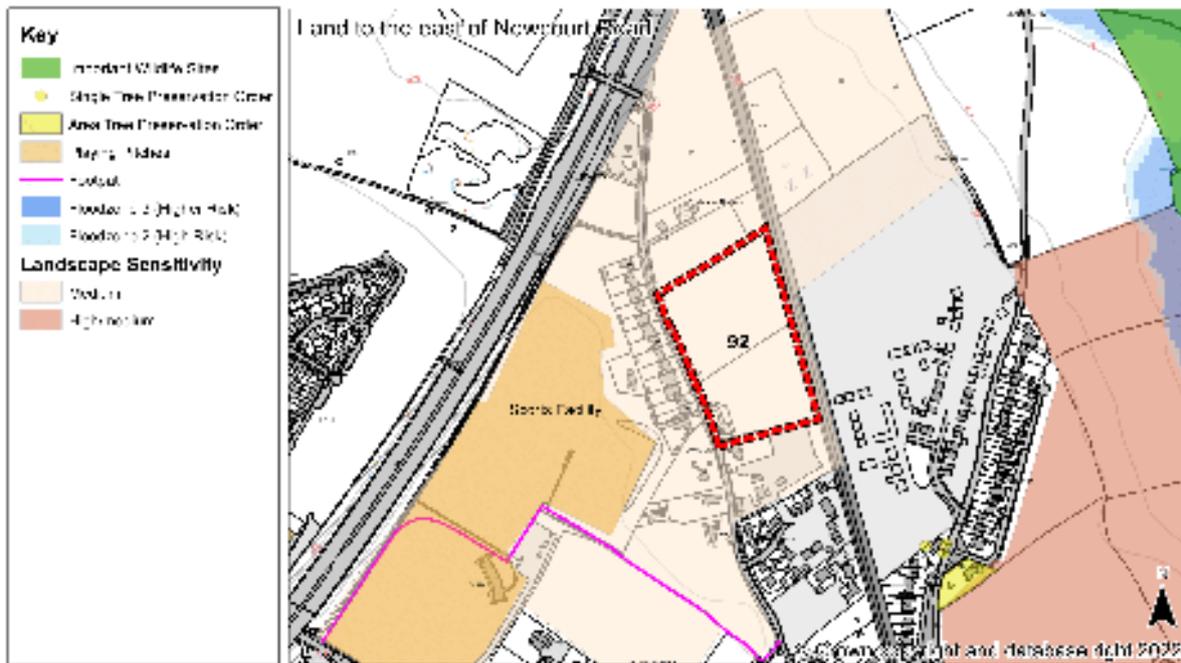
38

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- A mix of types and sizes of home, including affordable, that are net zero carbon
- High quality design that mitigates noise from the rail line and M5, safeguards significant trees and responds to high voltage power lines
- Measures to minimise car use and promote sustainable and active travel, including financial contributions to significantly improve pedestrian/cycle links to Newcourt and Topsham rail stations, a new pedestrian/cycle bridge over the Avocet line and enhanced bus services between Exeter and Topsham
- Financial contributions towards local health and education services
- 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

Land to the east of Newcourt Road, Topsham – Site Reference 92



What is the site like now?

This greenfield site is located on the outskirts of Topsham and comprises a large field bounded by hedgerows, with two small storage buildings. The Avocet rail line adjoins to the east and Newcourt Road is to the west. The surrounding area includes existing homes, areas of land that are currently being built to provide new homes and the M5 motorway.

How many homes could be built over the next 20 years?

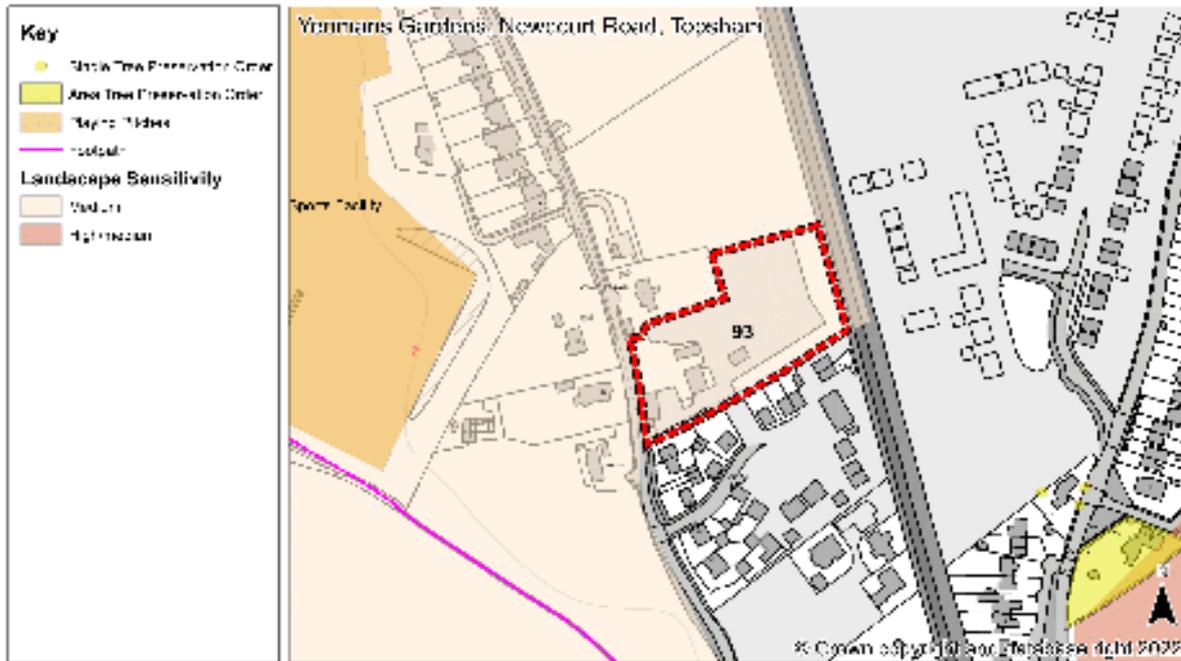
43

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- A mix of types and sizes of home, including affordable housing, that are net zero carbon
- High quality design that respects the amenity of nearby residents, mitigates noise from the rail line and M5, safeguards significant trees and hedgerows and responds to localised surface water flooding
- Measures to minimise car use and promote sustainable and active travel, including financial contributions to significantly improve pedestrian/cycle links to Newcourt and Topsham rail stations, a new pedestrian/cycle bridge over the Avocet line and enhanced bus services between Exeter and Topsham
- Financial contributions towards local health and education services
- 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

Yeomans Gardens, Newcourt Road, Topsham – Site Reference 93



What is the site like now?

This greenfield site is located on the outskirts of Topsham. It contains a number of greenhouses and sheds, a storage area/construction compound and a residential barn conversion. The Avocet rail line adjoins to the east and Newcourt Road to the west. The surrounding area includes existing homes, areas of land that are currently being built to provide new homes and the M5 motorway.

How many homes could be built over the next 20 years?

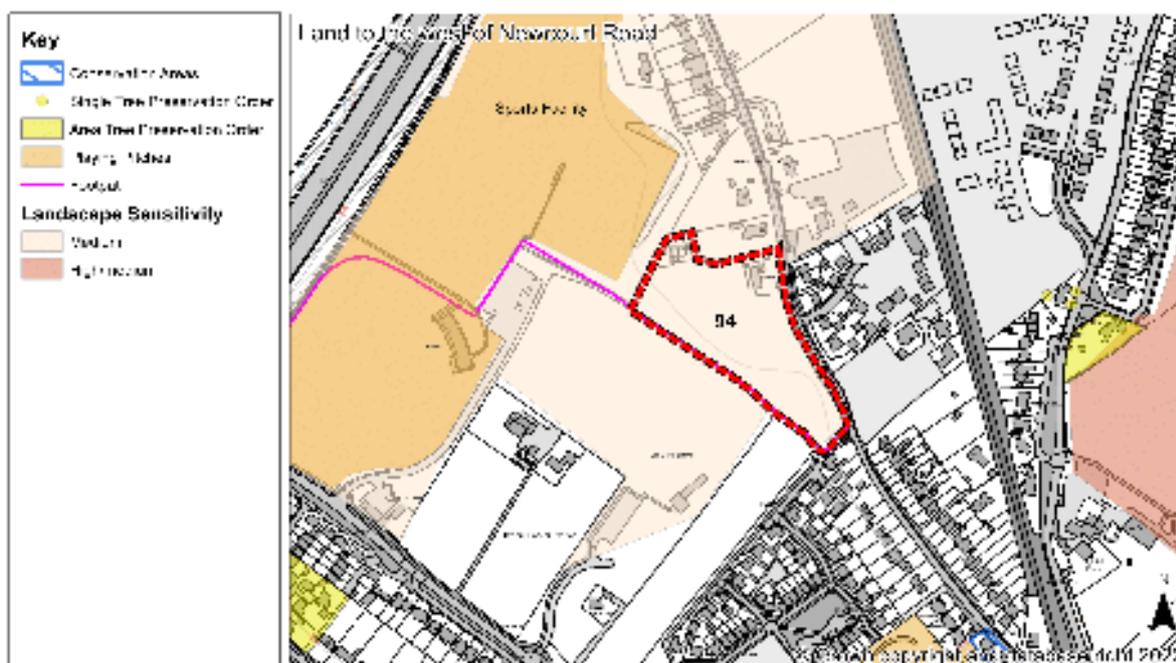
13 (net)

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- A mix of types and sizes of home, including affordable, that are net zero carbon
- High quality design that respects the amenity of nearby residents, mitigates noise from the rail line and M5, safeguards significant trees and hedgerows and responds to localised surface water flooding
- Measures to minimise car use and promote sustainable and active travel, including financial contributions to significantly improve pedestrian/cycle links to Newcourt and Topsham rail stations, a new pedestrian/cycle bridge over the Avocet line and enhanced bus services between Exeter and Topsham
- Financial contributions towards local health and education services
- 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

Land to the west of Newcourt Road, Topsham – Site Reference 94



What is the site like now?

This greenfield site is located on the outskirts of Topsham. It comprises a bungalow, associated outbuildings and a field and is accessed from Newcourt Road. The surrounding area includes existing homes, areas of land that are currently being built to provide new homes, the Topsham Golf Academy and the M5 motorway.

How many homes could be built over the next 20 years?

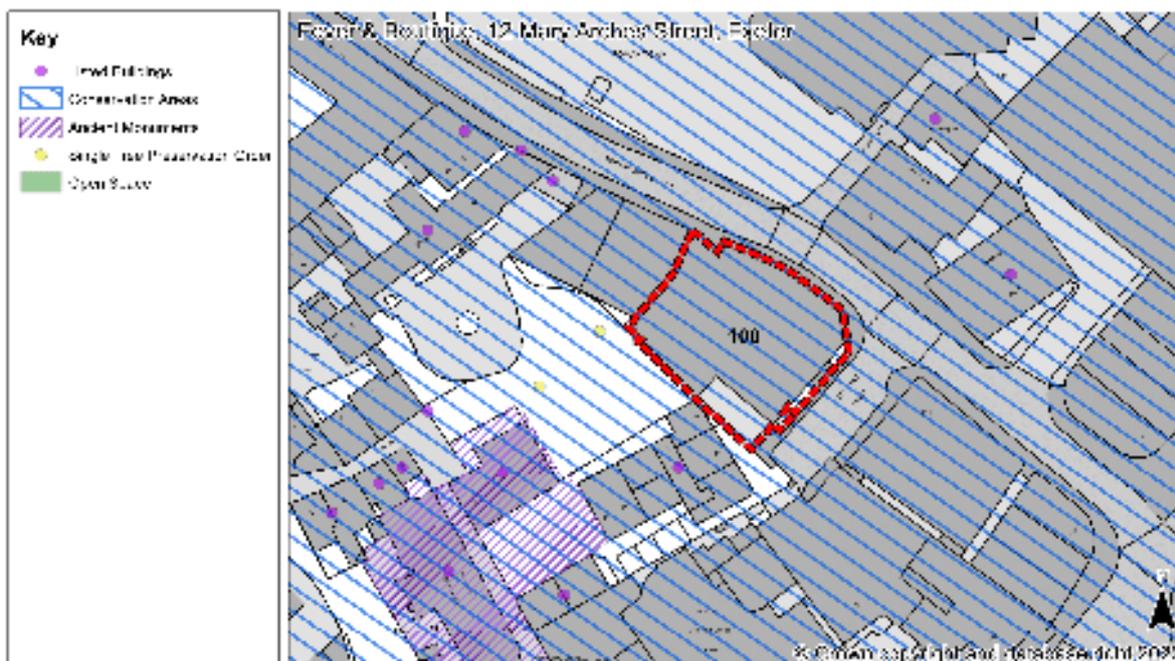
31 (net)

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- A mix of types and sizes of home, including affordable housing, that are net zero carbon
- High quality design that respects the amenity of nearby residents, mitigates noise from the rail line and M5, safeguards significant trees and hedgerows and responds to localised surface water flooding
- Measures to minimise car use and promote sustainable and active travel, including financial contributions to significantly improve pedestrian/cycle links to Newcourt and Topsham rail stations, a new pedestrian/cycle bridge over the Avocet line and enhanced bus services between Exeter and Topsham
- Financial contributions towards local health and education services
- 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

Fever and Boutique, 12 Mary Arches Street - Site Reference 100



What is the site like now?

This city centre site comprises a nightclub and an apartment and is within the Central Conservation area. The surrounding area contains a range of city centre uses including Mary Arches surface car park, a public house, grade II and II* listed homes and associated open space, offices and St Mary Arches Church (grade I listed).

How many homes could be built over the next 20 years?

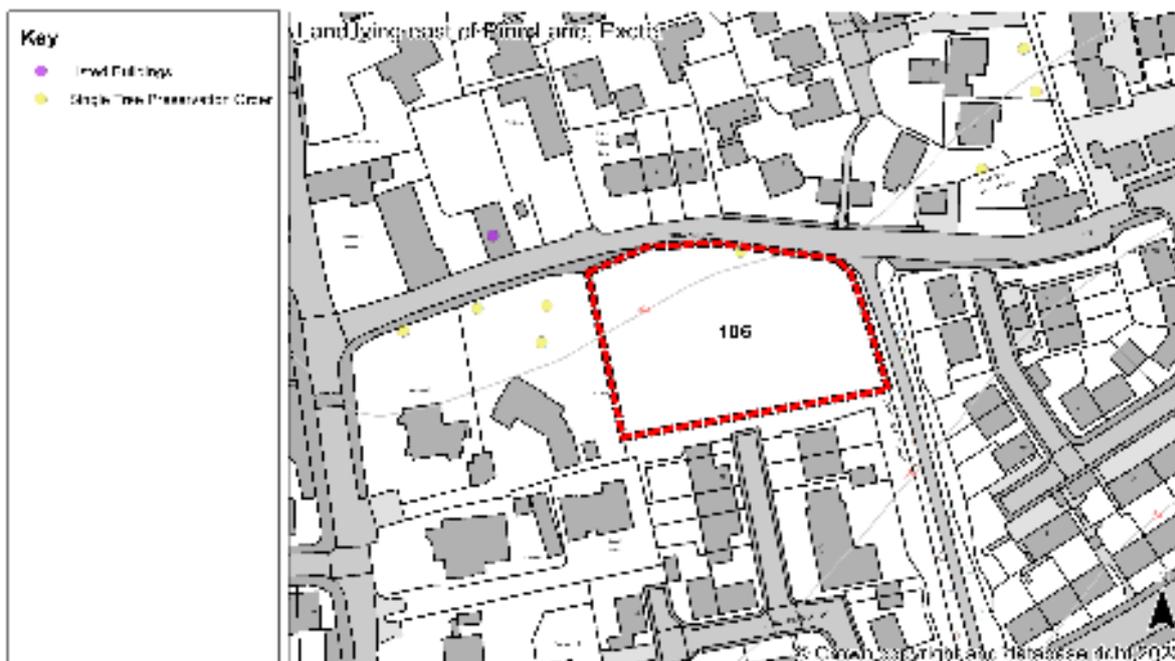
10 (net)

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- A mix of types and sizes of homes, including affordable housing, that are net zero carbon and car free, supported by more sustainable transport measures including car clubs and e-bikes
- High quality, high density design that celebrates and preserves nearby heritage assets, mitigates against noise, safeguards important trees and respects the amenity of neighbouring homes
- Financial contributions towards local health and education services
- 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

Land east of Pinn Lane – Site Reference 106



What is the site like now?

This greenfield site largely comprises scrub and is within a residential area. Gypsy Lane (pedestrian only) runs along the eastern boundary and Tithebarn Lane is to the north. The site is already allocated for development in the Exeter Core Strategy. The City Council proposes to carry this allocation forward into the Exeter Plan.

How many homes could be built over the next 20 years?

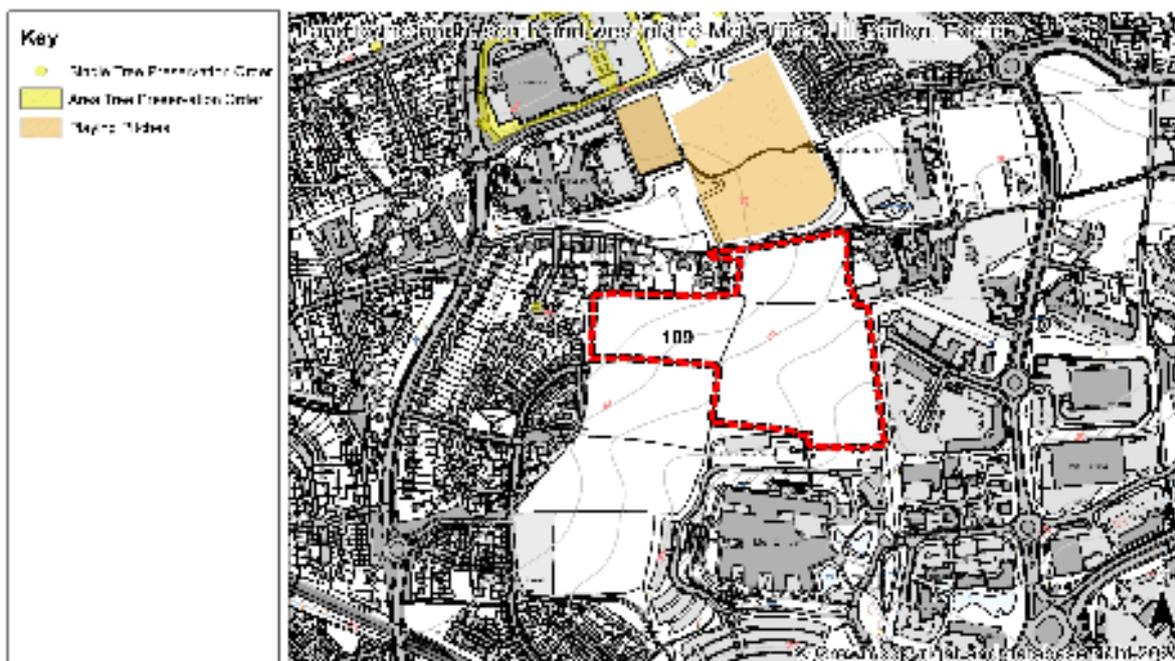
14

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- A mix of types and sizes of home, including affordable housing, that are net zero carbon
- High quality design that respects the amenity of residents living nearby, responds to nearby heritage assets and safeguards significant trees and hedgerows
- Measures to minimise car use and encourage and active and sustainable travel, including car-clubs, e-bikes and improvements to cycle and pedestrian links with the surrounding area
- 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

Land north, south and west of the Met Office – Site Reference 109



What is the site like now?

This greenfield site currently comprises three fields and is located in a residential area, with new homes also being constructed on land to the south. It is also close to the Met Office and Exeter Business Park, which lie to the east. The site is already allocated for development in the Exeter Core Strategy. The City Council proposes to carry the allocation forward into the Exeter Plan.

How many homes could be built over the next 20 years?

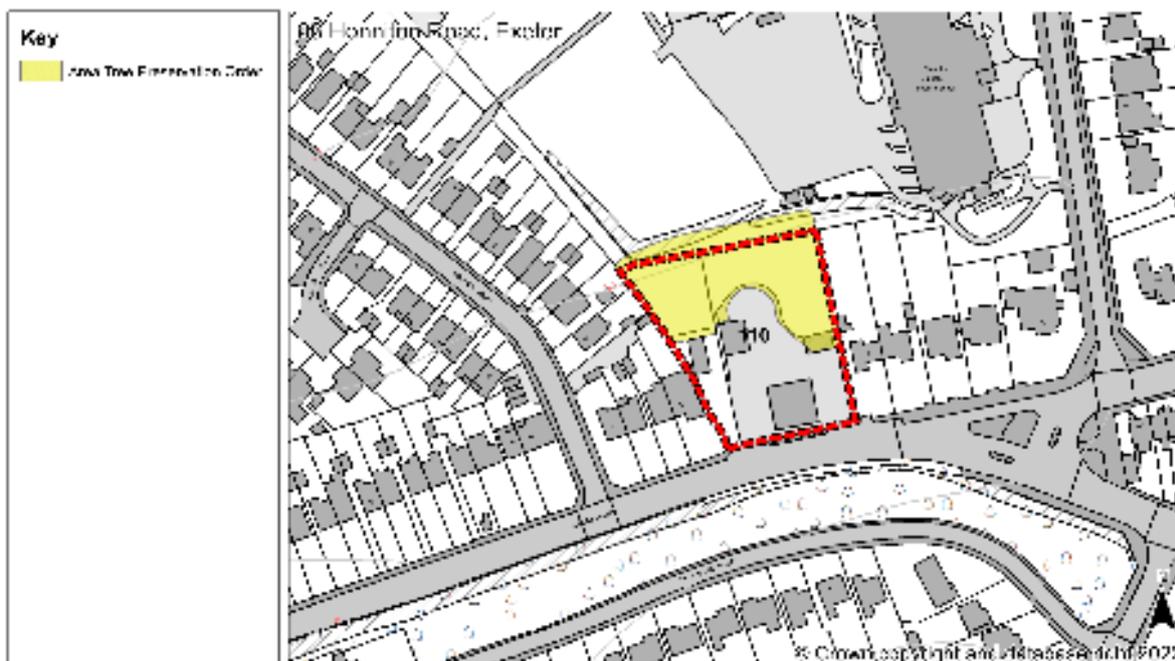
225

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- A mix of types and sizes of home, including affordable housing, that are net zero carbon
- High quality design that respects the amenity of residents living nearby and safeguards significant trees and hedgerows
- Children's play areas and public open space, including the provision of land to help create a new Monkerton Ridge Park
- Measures to minimise car use and encourage and active and sustainable travel, including car-clubs, e-bikes and improvements to cycle and pedestrian links with the surrounding area
- Financial contributions towards local health and education services
- 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

88 Honiton Road – Site Reference 110



What is the site like now?

This site is currently occupied by a car wash and some mature TPO trees. St Nicholas Catholic Primary School playing fields lie to the north, to either side it is residential and Honiton Road runs along the southern boundary

How many homes could be built over the next 20 years?

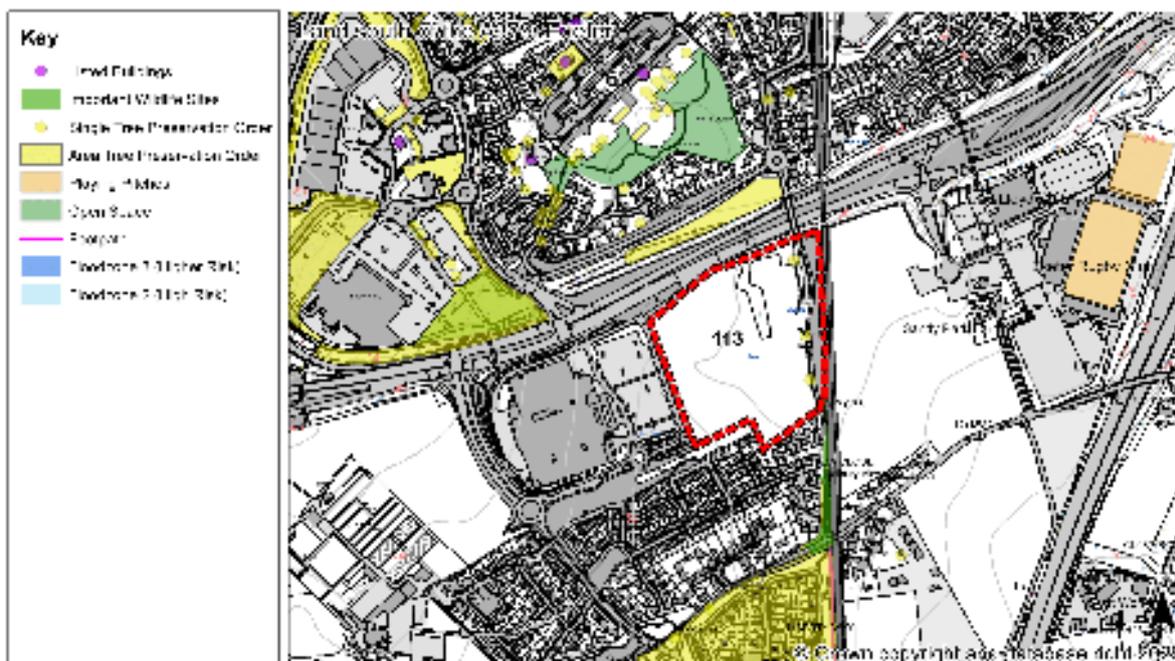
10

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- A mix of types and sizes of homes, including affordable housing, that are net zero carbon
- High quality design that respects the amenity of residents living nearby, protects the TPO trees, responds to localised surface water flood risks and does not create safeguarding issues for St Nicholas School
- Measures to minimise car use and encourage and active and sustainable travel, including car-clubs, e-bikes and improvements to cycle and pedestrian links with the surrounding area
- 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

Land south of the A379 – Site Reference 113



What is the site like now?

This greenfield site largely comprises scrub and some tree cover. An Ikea store adjoins to the west, the A379 runs along the northern boundary and the Avocet rail line lies to the east. To the south is a residential area. The site is already allocated for development in the Exeter Core Strategy. The City Council proposes to carry this allocation forward into the Exeter Plan.

How many homes could be built over the next 20 years?

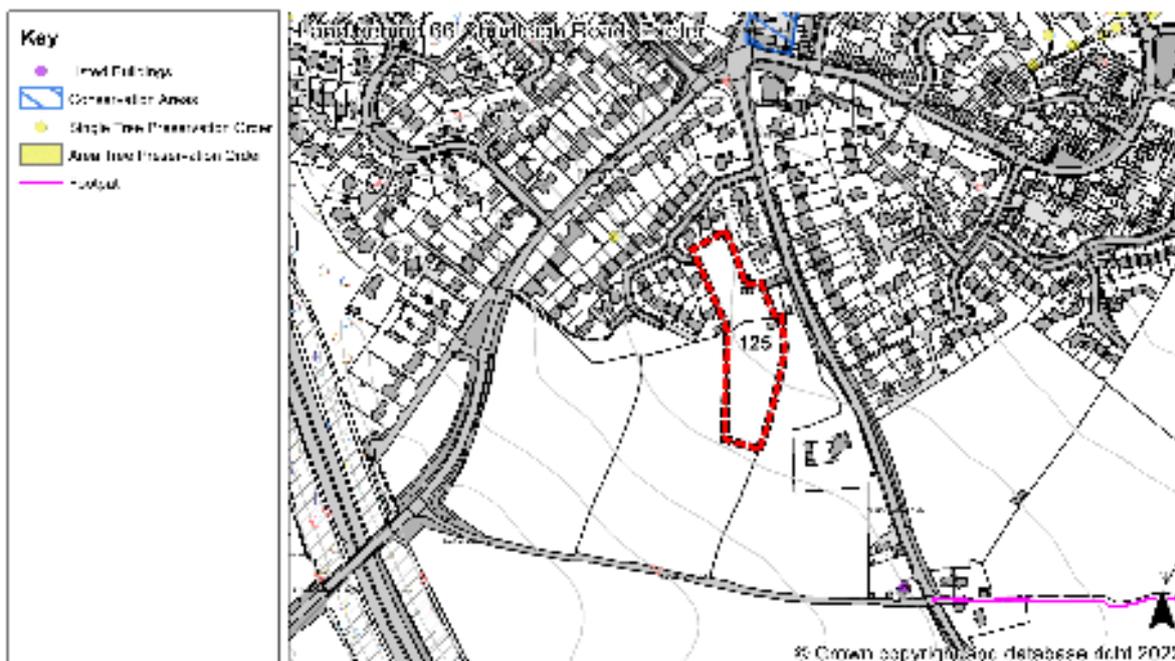
184

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- A mix of types and sizes of home, including affordable, that are net zero carbon
- High quality design that respects the amenity of residents living nearby, safeguards significant trees and mitigates against noise from the A379 and rail line
- Children's play areas and public open space
- Measures to minimise car use and encourage and active and sustainable travel, including car-clubs, e-bikes and improvements to cycle and pedestrian links with the surrounding area
- Financial contributions towards local health and education services
- 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

Land behind 66 Chudleigh Road – Site Reference 125



What is the site like now?

This greenfield site is located towards the edge of the city, to the south of existing homes. The southern half of the site is already allocated for development in the Exeter Core Strategy as part of the South West Alphington Strategic Allocation. The City Council proposes that the existing allocation should be expanded northwards in the Exeter Plan, to cover the area of land immediately rear of 66 Chudleigh Road.

How many homes could be built over the next 20 years?

16

What might the site be like in the future?

The site has the potential to provide a great place to live, with development that could include:

- High quality and net zero carbon design that takes into account the site's biodiversity assets, respects the amenity of neighbouring homes and responds to localised surface water flood risk.
- A mix of house sizes and types, including affordable housing
- New or improved pedestrian/cycle links with the surrounding area
- Well-managed public open space
- Financial contributions towards local health, education and public transport services
- 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

The Exeter Plan



Your views are valued and responses to the questions will help shape the future of the new Exeter Plan.

Contact details

Local plan team, Exeter City Council,
Civic Centre, Paris Street, Exeter, EX1 1JN

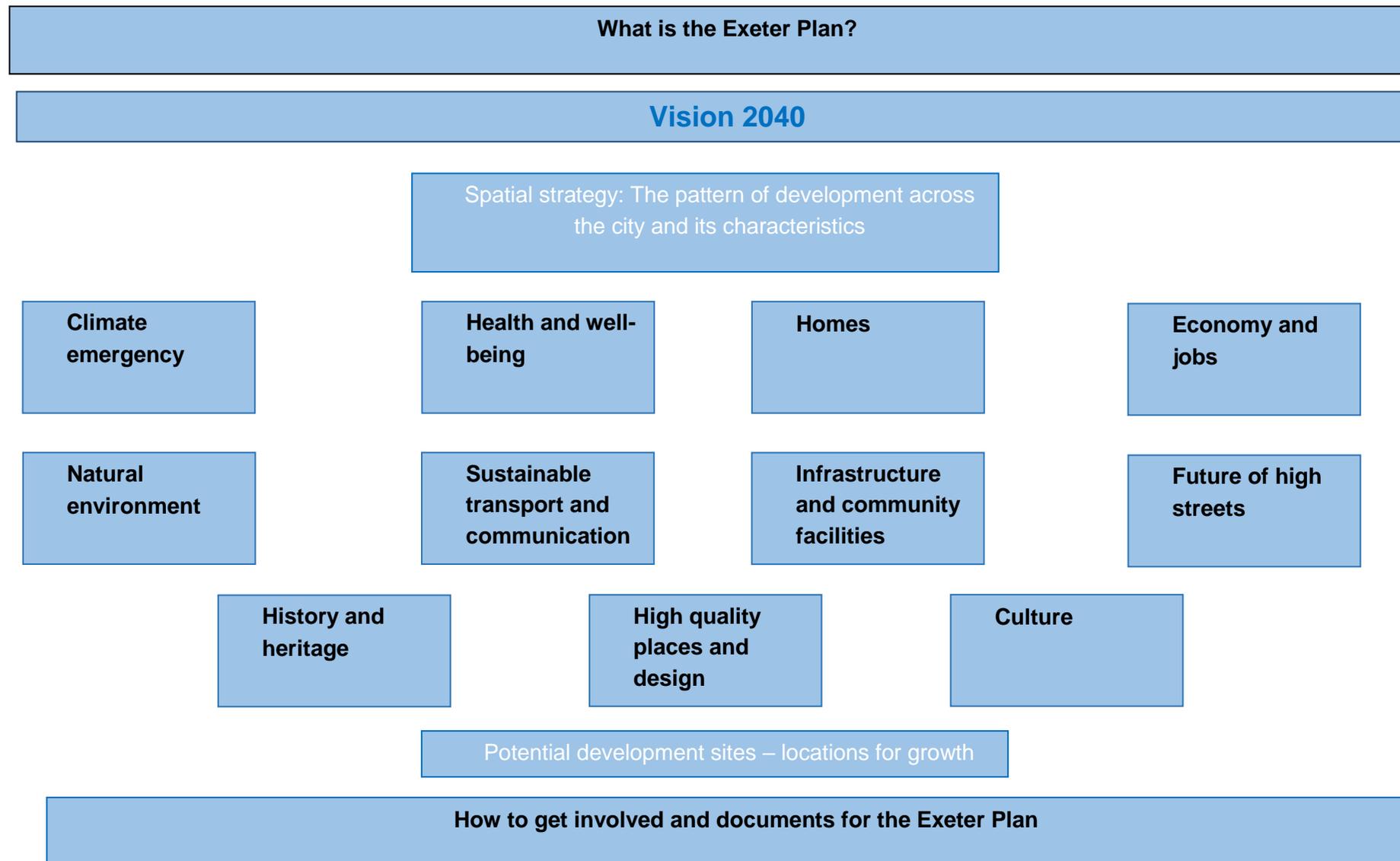
01392 265080
planning.policy@exeter.gov.uk
exeter.gov.uk/localplan

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We consider requests on an individual basis.

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Appendix B: Presentation concept for the Exeter Plan outline draft consultation



Equality Impact Assessment: Exeter Plan: Outline draft consultation

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty, authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name and date:	Report title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Executive 6 September 2022	Exeter Plan: Outline draft consultation	That Executive 1) That the Executive approves the Outline Draft Exeter Plan (content included in Appendix A) as the basis for public consultation for eight	Potentially all groups with protected characteristics. The Exeter Plan has the potential to impact upon all residents of Exeter. The aim is that the plan will improve the city and the lives of all residents irrespective of protected characteristics. At this

Committee name and date:	Report title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
		<p>weeks commencing on 26 September 2022; and</p> <p>2) That the Executive gives delegated authority to the Director of Planning and Development, in consultation with the Council Leader and Portfolio Holder for City Development, to agree minor changes to the Outline Draft Plan content before it is published for consultation.</p>	<p>stage the plan does not include a full set of policies and therefore impacts are currently difficult to assess.</p>

The assessment

For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact – some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive, neutral or negative impact	High, medium or low impact	Reason
categories are for illustration only as overriding consideration should be given to needs).	Positive/negative		<p>appropriate housing for all groups and makes reference to the importance of accessibility for all in terms of public space and transport.</p> <p>The consultation methods to be used may be positive for some age groups and negative for others; digital activities often provide improved access for younger groups while an over-emphasis can exclude older groups. A balance will need to be provided.</p>
Pregnancy and maternity including new and breast feeding mothers	Positive	Low	<p>The plan does not include specific policies relating to this protected characteristic. However it does aim to provide appropriate housing for all groups, flexible employment and makes reference to the importance of accessibility for all in terms of public space and transport.</p>
Marriage and civil partnership status	Neutral		<p>The plan does not include specific policies relating to this protected characteristic and therefore no impact is anticipated.</p>

Actions identified that will mitigate any negative impacts and/or promote inclusion

Continued consideration of the impact of emerging plan policies on groups with protected characteristics.
Consideration of a wide breadth of consultation methods to support the needs of groups with protected characteristics.

Officer: George Marshall: Assistant Service Lead: Local plans

Date: 05.08.2022

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