

EXECUTIVE

Date: Tuesday 3 October 2023

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 Manager 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, Foale, Morse, Parkhouse, Pearce, Williams, R 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 September 2023.

(Pages 5 -
10)

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

It is considered that the Committee would be unlikely to exclude the press and

public during consideration of any of the items on the agenda, but if it should wish to do so, the following resolution should be passed:-

RECOMMENDED that, under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the consideration of the particular item(s) on the grounds that it (they) involve(s) the likely disclosure of exempt information as defined in the relevant paragraphs of Part 1, 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 Democratic Services Manager 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 Overview of General Fund Revenue Budget 2023/24 – Quarter 1

To consider the report of the Director Finance.

(Pages 11
- 32)

7 2023/24 General Fund Capital Monitoring Statement – Quarter 1

To consider the report of the Director Finance.

(Pages 33
- 46)

8 2023/24 HRA Budget Monitoring Report – Quarter 1

To consider the report of the Director Finance.

(Pages 47
- 64)

9 Net Zero Exeter update

To consider the report of the Chief Executive.

(Pages 65
- 92)

10 Review of Exeter City Living

To consider the report of the Chief Executive.

(Pages 93
- 134)

11 Consultation of the local Council Tax Support Scheme for 2024-25

To consider the report of the Director Finance.

(Pages
135 - 140)

12 Exeter Plan: Full Draft Plan consultation

To consider the report of the Director of City Development.

(Pages
141 - 288)

13 Consultation on Liveable Water Lane: Development Framework and Design Code Supplementary Planning Document

- To consider the report of the Director of City Development. (Pages 289 - 456)
- 14 **Householder’s Guide to Extension Design Supplementary Planning Document (SPD)**
- To consider the report of the Director of City Development. (Pages 457 - 498)
- 15 **Food Law and Health and Safety Enforcement Service Plan 2023 - 2024**
- To consider the report of the Director Net Zero and City Management. (Pages 499 - 544)
- 16 **Air Quality Annual Status Report**
- To consider the report of the Director Net Zero and City Management. (Pages 545 - 654)

Date of Next Meeting

The next scheduled meeting of the Executive will be held on **Tuesday 7 November 2023** 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 September 2023

Present:

Councillor Bialyk (Chair)

Councillors Denning, Foale, Morse, Parkhouse, Pearce, Williams, R and Wood

Also present:

Councillor Jobson (as an opposition group Leader)

Councillor D. Moore (as an opposition group Leader).

Apologies:

Councillors Wright and Councillor M. Mitchell (as an opposition group Leader)

Also present:

Chief Executive, Service Lead Revenues, Benefits & Customer Access and Democratic Services Manager

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MINUTES

The minutes of the meeting held on 27 June 2023, were taken as read, approved and signed by the Chair as correct, subject to the typographical amendment relating to the attendance of Councillor M. Mitchell as being in attendance.

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DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

82

QUESTIONS FROM THE PUBLIC UNDER STANDING ORDER NO. 19

No questions from members of the public were received.

83

REVIEW OF THE CORPORATE RISK REGISTER

The Executive received the report on the Corporate Risk Register and were advised that as part of the Council's revised approach to risk management, the register was now based on the delivery of the Corporate Plan 2022-26.

Members were advised that the Council's Directors had been working with their relevant Portfolio Holder's to capture the risks and mitigations. The risk register would be reviewed on a quarterly basis by the Strategic Management Board (SMB) and would be reported to the Executive for monitoring.

Particular reference was made to the Audit and Governance Committee, who would continue to have a role in ensuring that the Council had a robust process for identifying and mitigating risks. It was also expected that some of the likelihood risk scores on the register should decrease over time as focus is made on specific areas.

The Leader enquired on the matrix table and how risks were scored.

The Chief Executive advised on how risk scoring was achieved. The inherent risks indicated an assessment of the overall risk and the residual risk was the risk that

remained after the controls and mitigations. Where scoring remained red but with a lower risk score meant that the Council had reduced the likelihood of the risk occurring. Directors would work on coming up with additional proposed mitigations for discussion with Portfolio Holders.

Councillor Jobson, as an opposition group leader, spoke on this item and thanked officers for the hard work involved to date.

Councillor D. Moore, as an opposition group leader, spoke on this item and expressed concern on there being no mitigations or lead resource allocation for the Net Zero and Climate Crisis. She raised concerns relating to the misalignment of the UK with the Devon Climate Plans, which needed to be considered with greater caution and actioned sooner, with analyses on the impacts of failing to mitigate reducing greenhouse gases or adapt the city to future challenges. The Council needed to take a similar approach to the Government in policy and strategy for addressing Net Zero in the city.

Councillor Moore raised the following three questions:-

- (1) In relation to building greater neighbourhoods and communities, why was the risk of low land/property values and lack of investment appetite, a greater inherent risk than residents not being able to afford to rent or buy the new homes built under this approach?
- (2) Which consultants had been appointed to undertake the full business case for the Exeter Development Fund and what are targets for the delivery of affordable housing and infrastructure under this model and will they be modelling the greenhouse gas emissions for the programme delivery of the fund?
- (3) Would each Portfolio Holder undertake a serious attempt at properly assessing the policies and strategies of the Council and the partnerships they are involved in to reduce inequality and address climate change.

The Leader advised that the risk register report was in relation to the overall risks of the Council and how they were being addressed. Individual risks would be discussed in other forums as required. He requested that the questions be submitted to him. The responses are appended to the minutes.

During the discussion the following points were made:-

- the risk area for delivering housing and building greater neighbourhoods had recently changed responsibility from both the Leader and Portfolio Holder for City Development and there were some mitigations that required moving for specific area;
- the work that had been undertaken on the risk register and the process of being presented to the Executive to advise Portfolio Holders was welcomed; and
- the Corporate Risk Register provided an overall top tier of risks, where other registers reported on specific risks, including progress on Net Zero. The register didn't record all the work of the Portfolio Holders but was designed to outline the risks and mitigations for reducing them.

In response to questions and points raised by Members, the Chief Executive advised:-

- it was the intention to bring the Risk Register to the Executive on a quarterly basis;
- any refinements would be addressed following Members' discussion;
- progress on the Council's work towards achieving carbon reductions for its operations would be reported to the relevant Scrutiny Committee and a future report would also be brought to the Executive on Net Zero in light of the close down of Exeter City Futures; and
- the positive work on delivering strategic objectives would be available in the Annual Review of the Corporate Plan.

RESOLVED that:-

(1) a quarterly report on the Corporate Risk Register be submitted to the Executive as the responsible committee to ensure it takes necessary actions to mitigate any identified risks for which it is responsible; and

(2) the revised Risk Register in Appendix A of the report presented at the meeting, be noted, with Members assured that the proposed mitigations set out are appropriate to address the risks identified.

84

COUNCIL TAX EXEMPTION FOR CARE LEAVERS

The Executive received the report which sought Members agreement for in-principle support for a Council Tax exemption for care leavers up to the age of 25. A subsequent report would be presented to Executive in November 2023 outlining the financial impact of the in-principle support

Work was being undertaken with Devon County Council and other District Councils in Devon, following recent focus on the responsibility of local councils in being a Corporate Parent. Members were referred to the seven corporate parenting principles outlined in the report and advised that district level authorities must have specific regard to Council Tax, Housing and Leisure functions. Although the report was focussed on Council Tax, work with Team Devon was being undertaken in relation to care leaver support for Housing and Leisure functions.

The Service Lead Revenues, Benefits and Customer Access presented the report and made particular reference to:-

- There had been a Devon wide process for supporting care leavers with a Council Tax liability, which had been agreed by Members in 2019. The Council Tax Team Leader had been designated the nominated contact in Exeter for care leavers in relation to Council Tax. For those care leavers entitled to Council Tax support, where there was any shortfall the financial difference could be cleared using the exceptional hardship fund. For those with no entitlement to Council Tax support, a write-off could be considered.
- Section 13A (1) (c) of the Local Government Finance Act 1992, provided Councils with discretionary powers to reduce the amount of Council Tax payable to a person, and any write off amounts would be made under these powers.
- The cost of Council Tax support and the exceptional hardship fund was apportioned between Exeter City Council, Devon County Council and the Police and Fire Authorities as per the preceptor percentages for Council Tax. However, Exeter City Council would have to meet the cost of any write offs.

- Although Devon County Council was the corporate parent, there was a county wide ambition to strengthen the local offer to care leavers and following advice from the National Advisor for Care Leavers, an element of the offer was a Council Tax exemption for care leavers up to the age of 25.
- There were 161 care leavers between 18 and 25 in Exeter, of which 50 had a current Council Tax liability and 32 of those were in arrears, highlighting that there was a vulnerability for younger people.
- The annual cost would be dependent on the agreed final policy, however, the discretionary awards for these 50 residents after national discounts, would be a £60,000 cost to the Council. If the discretionary awards were made after the Council Tax support application, the cost would be reduced to £25,000 per year. Anything introduced during this financial year would likely reduce the amount to an estimated £12,000.
- Section 151 Officers were meeting regularly to discuss how exemptions would work to support the final policy for Member approval. It was likely that there would be amendments made to the Council Tax Support Scheme from April 2024 to award 100% Council Tax support to care leavers. Exeter having the highest number of care leavers, had a higher financial risk, and negotiations on funding mechanisms were still on going.

Councillor D. Moore, as an opposition group leader, spoke on this item and welcomed the report. As part of implementing the policy, she suggested that as single person relief is lost when a person rented a room to a care leaver that retaining the single person relief until the care leaver was 25 years, would encourage additional availability of accommodation to care leavers until they were ready to live on their own.

The Leader advised that the suggestion could be raised with Team Devon as part of the partnership working in developing the final policy.

Councillor Jobson, as an opposition group leader, welcomed and supported the report.

During the discussion the following points were made:-

- the in-principle proposal had brought District Councils together to support care leavers and any final proposal would be made in cooperation with other authorities to agree a best practice solution;
- the Council had a range of support mechanisms for other residents requiring support, and the proposal was seeking to provide support to care leavers who were identified as being vulnerable and would benefit from the policy; and
- the policy would support vulnerable people in the community whilst supporting officer resources.

Members welcomed the report which would provide support to younger residents at financial risk and made their thanks to the Service Lead Revenues, Benefits & Customer Access for the work undertaken.

In response to questions and points from Members, the Service Lead Revenues, Benefits and Customer Access explained:-

- the estimated £12,000 cost would only apply should the policy be introduced during the current financial year;

- Section 13A (1) (c) of the Local Government Finance Act 1992, set out the governance legislation, in which Exeter City Council had discretionary powers and would incur the full cost. Where a care leaver was given Council Tax Support, the cost of the scheme would be shared between the preceptor authorities; and
- prior to receipt of the latest carer details, the Council had only been notified of 16 care leavers since 2019. From looking at individual cases due to being unaware that the account belonged to a care leaver, that unfortunately in some instances recovery action had been taken but this has now been withdrawn.

RECOMMENDED that in principle agreement be given for a Council Tax exemption for care leavers up to the age of 25 and looked after by Devon County Council, subject to a further report setting out all the implications including the financial impact on Exeter City Council.

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MEMBERS TRAINING

The Executive received the report on the progress of work on the Members' training programme and the attendance and feedback for the various training sessions, since May 2023.

Particular reference was made to:-

- there had been 18 training and briefing sessions held since May, which showed an average attendance of 49%;
- there had been an increased number of Councillors who were not in attendance of the live sessions, who had used the recordings to confirm that they had completed the training;
- there had been 41 feedback responses, showing that 50% of Members were very satisfied and 40% satisfied with the training received. All feedback was sent to the training providers for their information;
- the online training platform had been renewed for another year and Members were encouraged to complete the GDPR training and Safeguarding training; and
- an Effective Scrutiny training session had been arranged on 7 September and a further training session for Council Meetings and Procedures had also been arranged for November 2023.

The Portfolio Holder for Corporate and Democratic Services and Environmental Health advised that the Councillor Development Steering Group had recently met and discussed the training programme. They agreed that there was excellent training being provided, particularly for new Councillors. They also suggested that some additional work was required on the training for more experienced Councillors, with more variety and engagement, for Licensing and Planning training sessions.

Councillor D. Moore, as an opposition group leader, spoke on this item and advised that Members of her group had been satisfied with training provided to date.

During the discussion the following points were made:-

- thanks and recognition to the Assistant Democratic Services Officer for the hard work undertaken in organising the training programme, particularly for the period following the elections;
- thanks to all the officers who had provided training and shadowing opportunities to date.

- assurance was needed that points raised in Councillor Feedback would be acted on by the providers; and
- the report highlighted the volume of work and training undertaken by Councillors which demonstrated their commitment to their role as elected Members.

The Leader welcomed the report and the first rate training provided to Members.

RESOLVED that the Executive Committee note the Members' Training report.

(The meeting commenced at 5.30 pm and closed at 6.20 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 17 October 2023.

REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

REPORT TO COUNCIL

Date of Meeting: 17 October 2023

Report of: Director Finance

Title: Overview of General Fund Revenue Budget 2023/24 – Quarter 1

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

To advise Members of the overall financial position of the General Fund Revenue Budgets for the 2023/24 financial year after three months.

2. Recommendations:

It is recommended that Members of the Executive note the report and Council notes and approves (where applicable):

- (1) The General Fund forecast financial position for the 2023 financial year;
- (2) The supplementary budgets and budget transfers as detailed in paragraph 8.10 and Appendix 3;
- (3) The outstanding Sundry Debt position as at June 2023;
- (4) The creditors payments performance; and
- (5) The One Exeter programme update

3. Reasons for the recommendation:

To formally note the Council's projected financial position and to approve additional expenditure required during the financial year.

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

The impact on the General Fund working balance is set out in section 8.9.

The General Fund Working Balance is projected to stand at £4.337 million at year end.

5. Section 151 Officer comments:

Whilst the overall picture looks to be on track, the shortfall in income, particularly car parking and trade waste is of concern. It continues a trend that started in Q4 of 2022-23 and means that we are not receiving all the income that we rely on to deliver services. Whilst this year, those deficiencies look to be covered by lower than expected utility costs

and significant vacancies across the Council, this cannot be relied upon as a longer term solution and Members need to be aware of the impact this will have on future service budgets.

6. What are the legal aspects?

Section 28 of the Local Government Act 2003 imposes a statutory duty on the Council to monitor during the financial year its expenditure and income against the budget calculations. If the monitoring establishes that the budgetary situation has deteriorated, the Council must take such action as it considers necessary to deal with the situation. This might include, for example, action to reduce spending in the rest of the year, or to increase income, or to finance the shortfall from reserves.

The Local Government Finance Act 1992 places a legal requirement on Council to approve not only the budget but also any changes to the budget proposed during the year. Council has a legal duty to ensure that the budget is balanced and that any changes to the budget are fully funded.

7. Monitoring Officer's comments:

This report sets out the Council's financial position for the first quarter. As such this report is for members' information. Having said that, the Monitoring Officer would like to remind members of their obligation to exercise their fiduciary duty carefully. The meaning of fiduciary duty can be summarised as a duty to conduct administration in a business-like manner with reasonable care, skill and caution and with due regards to the council's rate payers. When discharging their fiduciary duties councillors will need to consider the following:

- a. Prudent use of the council's resources, including the raising of income and the control of expenditure;
- b. Financial prudence both long and short term;
- c. Striking a fair balance between the interest of the council tax payers on the one hand and the community interest and adequate and efficient services on the other hand;

8. Report details:

Overview of General Fund Revenue Budget 2023/24 – Quarter 1

8.1 Financial Summary

FUND	Planned Transfer To / (From) Working Balance £	Budget Variance Over / (under) £	Outturn Transfer 2023/24 £
General Fund	(2,344,930)	530,770	(1,814,160)

8.2 General Fund (Appendix 1 & Appendix 2)

The current forecasts show an overall projected overspend of £207,330 against a revised budget of £20,923,740. This includes supplementary budgets of £6,597,320 already agreed by Council. Variances of more than +/- £30,000 are detailed below:

8.3 City Development

Budget Heading	Over / (Underspend)
Housing Needs and Homelessness	£51,420
<p>Responsible Officer: Service Lead, Housing Needs & Homelessness</p> <p>The financial impact of the proposed pay offer of £1,925 across all grades will cause overspends on the salary budgets.</p>	
Planning	£31,960
<p>Responsible Officer: Service Lead, City Development</p> <p>The financial impact of the proposed pay offer of £1,925 across all grades will cause overspends on the salary budgets.</p>	

8.4 Communications, Culture and Leisure Facilities

Budget Heading	Over / (Underspend)
Markets & Halls	(£183,860)
<p>Responsible Officer: Facilities & Markets Manager</p> <p>Income forecasts are looking positive already for the year, especially at The Matford Centre. Kivell's are anticipating another successful year with £80,000 above the income target and the car parks are forecast to make £15,000 above budget. There are also forecast savings against utilities in both the Matford Centre and the Corn Exchange, in the region of £81,000. There are also small savings in establishment vacancies which is currently mitigating the estimated pay award and several properties have been re-evaluated by the Valuation Office, resulting in a small saving in rates as well. The revenue streams will be monitored carefully to ensure that these forecasts are achieved.</p>	
Museum Services	(£277,650)

Responsible Officer: Museums Manager & Cultural Lead	
The underspend forecast at quarter one is predominantly due to vacancies within the RAMM staffing establishment of £74,000 and a savings against utility budgets of approximately £220,000. This has been used to offset an estimated shortfall in shop revenue. These material savings will be monitored closely throughout the year, especially regarding utilities, and adjusted as necessary. The new establishment structure has been approved during the Summer and the reorganisation is due to happen by Christmas 2023; savings from this will be reflected in the 2024/25 budget	
Leisure & Sport	(£786,390)
Responsible Officer: Director - Communications, Culture & Leisure	
This reported underspend is mainly due to a forecast surplus to membership income. This reflects growing public confidence after the Covid pandemic and the cost of living crisis; footfall has been steadily increasing since the beginning of the year and is now exceeding what it was at the same point last year. However, as this is the first year that all the centres will be open and at capacity, the trend for membership growth is still unknown so the forecast has remained cautious at this time. An underspend of £254,000 in utilities has also been forecast; both of these areas will be monitored closely as the year progresses.	
An unforeseen impact on the forecast has been the inclusion of routine maintenance costs. £200,000 was added to the Corporate Property – Assets budget for Leisure & Sport to reflect the centres being bought in-house; however, the delay in restructuring this team has meant that costs are being borne by the individual centres. As with income, it is difficult to forecast the cost of maintaining (mainly) aging buildings which are running at peak capacity, so a prudent approach has been taken in forecasting, including the assumption that the Assets team restructure will not be completed by year-end. Therefore, a £200,000 underspend has been reported in Corporate Property and an overspend in Leisure & Sport; again, this will be monitored throughout the course of the year and adjusted as necessary.	

8.5

Net Zero Exeter and City Management

Budget Heading	Over / (Underspend)
Environmental Protection	(£87,480)
Responsible Officer: Service Lead – Environmental Health & Community Safety	
Vacancies within the Neighbourhood and Environmental Quality Teams have more than compensated for the extra cost of the pay offer across the service unit. An increase in funds available for Disabled Facilities Grants has also increased the administrative burden rechargeable to the grant allocation above budgeted levels.	
Licensing, Food, Health & Safety	£178,490

Responsible Officer: Service Lead – Environmental Health & Community Safety	
Home Call income continues to fall short of the income target, despite the marketing campaigns that have taken place since March, which have already succeeded in generating some new customers. Additional sources of income, in particular making use of the Council’s expertise in the field of CCTV monitoring, are being developed to help offset this issue with contracts due on stream during the year.	
Parking Services	£988,770
Responsible Officer: Service Lead – Net Zero and Business	
The introduction of car park re-zoning from mid-May is expected to generate additional income, but it is still not anticipated that Car Park charges will break-even. There has only been 6-7 weeks of data available to examine to forecast the year end position; with the skew of budgets towards Quarter 3 it is difficult to assess the year-end position with confidence, but at present a shortfall of £650k is a prudent estimate. Quarter 1 achievement of target is just in excess of 95%.	
Season ticket income continues to be affected by changes in demand, as a result of commuters working from home. Changes to the discounts offered are anticipated to reduce the adverse outturn variance, but not sufficiently to bring back into balance in the current year. Quarter 1 achievement is only just in excess of 50% of budget, with no history of a steep rise in the remainder of the year being likely it is prudent to forecast under-achievement at the same rate giving a shortfall of £330k. Parking permits will be reviewed this financial year to address new trends.	
Waterways	£125,360
Responsible Officer: Service Lead – Harbour Master	
The Exeter Port Authority operates a mooring repairs service, purchased by the Council a number of years ago. The intention was for this to be self-financing, but costs have increased significantly whilst workload and income has not. The opportunity is still available but, without the HRO currently being progressed, improvement will be slow – the current forecast is for an overspend of £54k against a budgeted surplus of £23k.	
Canal licences represent the other area of concern – despite a significant uplift in rates chargeable there has been limited increase in income in the opening quarter The forecast is for there to be some improvement in comparison with 2022/23, but that income will be some £55k below budgeted level.	
Engineering Services	(£128,350)
Responsible Officer: Service Lead – Public and Green Space	
The team have been successful in recruiting to most of the vacancies experienced over previous years and can look forward to pursuing both revenue and capital schemes more actively as a result. Funding relating to the proposed demolition of an over-bridge is hoped not to be required in-year giving rise to the forecast underspend at year end.	
Domestic Waste Collection	(£438,190)

Responsible Officer: Service Lead – Waste, Recycling & Fleet

The service has suffered continuing operational difficulties as it struggles to recruit. In addition there is a delay to further roll out of the doorstep food waste programme until the construction of the food waste bay, so there will be savings in the year due to vacancies and vehicles not yet being leased. These savings will more than offset from being unable to claim from DCC's Share Scheme saving fund, to which we have no eligibility until the scheme achieves 100% coverage.

Waste Chargeable Services**£606,660****Responsible Officer: Service Lead – Waste, Recycling & Fleet**

As reported in previous years there is a shortfall in the trade waste income budget which whilst new contracts have come online will not meet the income target set for the service. However, Trade Waste continues to generate an operating surplus against the costs associated with delivery. Other income aspects of the service have recovered well since the pandemic and are recovering the costs associated with operational delivery.

8.6 Finance

Budget Heading	Over / (Underspend)
Corporate Property – Estates	(£97,310)
Responsible Officer: City Surveyor	
The Estates Services team have several vacancies in their establishment, leading to a forecast underspend of £154,400. This underspend has been reduced by a forecast overspend in leasehold property maintenance – this figure may potentially increase as the year progresses	
Corporate Property – Assets	(£226,620)
Responsible Officer: City Surveyor	
A £200,000 budget was added in the 2023/24 financial year to cover the maintenance requirements of the leisure facilities. Unfortunately, due to the delay in the restructure of the Assets team and a lack of resources, this additional budget cannot be utilised at this time. A corresponding overspend has been forecast in the Leisure & Sport management unit. This position may change during the year so will be monitored on a quarterly basis.	
Revenues, Benefits & Customer Access	£95,860
Responsible Officer: Service Revenues, Benefits & Customer Access	
The financial impact of the proposed pay offer of £1,925 across all grades will cause overspends on the salary budgets.	
Corporate	£67,260

Responsible Officer: Chief Financial Officer

This overspend is predominantly due to an increase of central bank charges. A budget for this will be added in the 2024/25 budget setting process.

Financial Services**£74,000****Responsible Officer: Deputy Chief Financial Officer**

This reported overspend is due to two factors: a £20,000 loss of leasehold flat insurance commission and £54,000 agency resources to provide accountancy support in respect of the Guildhall Shopping Centre. The agency costs will be met from the Guildhall Shopping Centre surplus.

8.7 Corporate Services

Budget Heading	Over / (Underspend)
Legal Services	£39,640
Responsible Officer: Service Lead – Legal Services The overspend is due to a materially adverse revenue forecast for the year, caused by a significant reduction in work carried out especially for ECL. This has been offset by an in-year saving from a vacant post (anticipated to be filled by December 2023) and a reduction in the use of temporary agency staff. There is potential for a new revenue stream to start in-year from carrying out work for other local councils; however, the details are still being worked through therefore nothing has been forecast at this stage. The situation will be reviewed at quarter two.	
Corporate Support	£222,200
Responsible Officer: Director, Corporate Services As in previous years, the shortfall in rental income at the Civic Centre of £335k has led to this under-performance against budget. This has been mitigated slightly by a forecast saving of around £137k for utilities. There is potential for a new tenant to move in; however, this is unlikely to make a material impact against the shortfall. The utilities forecast will be monitored carefully throughout the year to ensure it remains realistic.	

8.8 Other Financial Variations

Budget Heading	Over / (Underspend)
Net interest	(712,540)
Borrowing expected to be taken out early in 2023/24 has been postponed until later in the year/early next financial year due to current prohibitively high interest rates, and this is likely to result in savings in interest payable of £356k. Interest receivable is expected to be £356k more than budgeted due to increased rates on temporary investments and money market funds.	

8.9 General Fund Balance

In 2023/24 it is projected that there will be an overall net contribution from the General Fund Balance of £1,435,040. The minimum requirement for the General Fund working balance which was approved by Council in February 2023 at £3 million.

Movement	2023/24
Opening Balance, as at 01/04/23	£6,151,294
Net	(£1,814,160)
Projected Balance at Year End	£4,337,134

8.10 Supplementary Budgets

It is proposed that the supplementary budgets identified in Appendix 3 are approved and added to the 2023/24 budget.

- £45,640 will need to be funded by the general fund and will reduce the working balance.
- The remaining requests are all self-financing or funded by either CIL or an earmarked reserve and will have no impact on the projected General Fund working balance.

8.11 Outstanding Sundry Debt

An aged debt analysis of the Council's sundry debts is shown in the table below

Age of Debt	March 2022	March 2023	June 2023
Up to 29 days (current)	£1,154,547	£1,436,904	£2,581,462
30 days – 1 Year	£2,129,058	£1,697,735	£1,166,703
1 – 2 years	£387,330	£1,645,793	£2,010,656
2 – 3 years	£623,164	£199,426	£333,751
3 – 4 years	£280,899	£539,002	£348,240
4 – 5 years	£180,759	£254,721	£460,580
5 + years	£1,136,701	£1,186,130	£1,164,550
Total	£5,892,458	£6,959,711	£8,065,942

8.12 Debt Write-Offs

The following amounts have been written-off during 2023/24:

	2022/23 Total	2023/24 (Qtr 1)

• Council Tax	£160,603	£91,202
• Business Rates *	£487,464	£0
• Sundry Debt	£2,320	£0
• Housing Rents	£70,467	£18,808
• Non-HRA Rents	£76,325	£3,479
• HB Overpayments	£54,507	£36,342

* Business Rate write offs dealt with annually

8.13 Creditor Payments Performance

Creditors' payments continue to be monitored in spite of the withdrawal of statutory performance indicator BVPI8. The percentage paid within 30 days was 94.79% for the first three months of 2023/24 compared with 98.6% after the first three months of 2022/23.

9. One Exeter Update

As Members will be aware, One Exeter is the Council's transformation programme and is a critical priority for the council.

The One Exeter Team are continuing to work with the Members, the Union, the Strategic Management Board (SMB) and the Operational Management Board (OMB) to deliver the work programme which was agreed by Council.

Two reports were presented to Executive in February 2023. One report provided an annual summary of progress against the One Exeter Programme and the second report set out the proposed cost reductions identified for 2023/24. Work has now started on identifying cost reduction proposals for 2024/25. Appendix 5 sets out how the Council is performing against the 2023/24 cost reductions. At the end of quarter 1, it is forecast that £577k of the £3.049m will not be achieved, of which £458k relates to car park income. Car park income will therefore be subject to close monitoring by officers as an area of budgetary risk.

The Council's medium term financial plan anticipates reserves being reduced to the minimum required by 2024/25 and further budget reductions of £5.1m are required by 2028. Work has now started on identifying cost reduction proposals for 2024/25, which includes the cost reductions identified through the service reviews undertaken in December 2022.

Since the last update, the recently appointed Chief Executive has signalled a shift in focus to deliver on the strategic priority of 'Leading a Well-Run Council'. It is recognised that the One Exeter Programme will be integral to the delivery of this priority and going forward the programme will be structured around the six pillars of leading a Well- Run Council, as set out below:

- A balanced budget;
- Good governance;
- Value-for-money services;
- Customer-focussed services;
- Supported and developed staff and members; and

- Well-managed assets

A key area of work over the remainder of the financial year will be to develop a business case for the creation of single corporate functions for health and safety, enforcement, facilities management and sales and marketing. Having conducted an analysis of how the work is currently delivered, there is strong evidence to suggest that organisational efficiencies and improved customer experience can be achieved through bringing this work together.

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

This is a statement of the projected financial position to the end of the 2023/24.

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

The risks relate to overspending the Council budget and are mitigated by regular reporting to the Strategic Management Board and Members. Members have a legal responsibility to take action where balances are projected to reach an unsustainable level and the Strategic Management Board are working to address the current projected shortfall in reserves.

Areas of budgetary risk are highlighted in this report. The key areas of budgetary risks are attached as Appendix 4, for reference.

12. 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: because

11.4.1 There are no significant equality and diversity impacts associated with this decision.

13. Carbon Footprint (Environmental) Implications:

There are no direct carbon/environmental impacts arising from the recommendations.

14. Are there any other options?

Not applicable.

Director Finance & S151 Officer, Dave Hodgson

Authors: Nicola Morley, Bridget Kendrick and Mark Neville Smith

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

Background papers used in compiling this report:

None

Contact for enquires:

Democratic Services (Committees)

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2023/24 GENERAL FUND BUDGET MONITORING - SUMMARY

QUARTER 1

	Original Budget £	Supplementary Budgets & Transfers £	Revised Budget £	Year End Forecast £	Variance to Budget £
Chief Executive	3,168,000	686,110	3,854,110	3,842,710	(11,400)
Housing & Supporting People	4,413,300	(4,413,300)	0	0	0
City Development	967,430	3,773,710	4,741,140	4,828,370	87,230
Communications, Culture and Leisure Facilities	6,521,180	845,530	7,366,710	6,099,000	(1,267,710)
Net Zero Exeter and City Management	3,735,100	1,235,370	4,970,470	6,253,180	1,282,710
Finance	(2,541,900)	4,526,570	1,984,670	1,897,270	(87,400)
Corporate Services	2,843,220	(56,670)	2,786,550	2,990,450	203,900
less Notional capital charges	(4,779,910)	0	(4,779,910)	(4,779,910)	0
Service Committee Net Expenditure	14,326,420	6,597,320	20,923,740	21,131,070	207,330
Net Interest	1,320,000		1,320,000	607,460	(712,540)
Revenue Contribution to Capital	0		0	0	0
Minimum Revenue Provision	1,694,670		1,694,670	1,694,670	0
General Fund Expenditure	17,341,090	6,597,320	23,938,410	23,433,200	(505,210)
Transfer To/(From) Working Balance	(386,640)	(1,958,290)	(2,344,930)	(1,814,160)	530,770
Transfer To/(From) Earmarked Reserves	424,000	(4,582,200)	(4,158,200)	(4,183,760)	(25,560)
General Fund Net Expenditure	17,378,450	56,830	17,435,280	17,435,280	0
Formula Grant	(5,856,570)		(5,856,570)	(5,856,570)	0
CIL Income	(793,040)	(56,830)	(849,870)	(849,870)	0
Business Rates Growth / Pooling Gain	(3,272,000)		(3,272,000)	(3,272,000)	0
New Homes Bonus	(671,850)		(671,850)	(671,850)	0
Council Tax	(6,784,990)		(6,784,990)	(6,784,990)	0
	0	0	0	0	0

Working Balance March 2023 £ 6,151,294 £ 4,337,134 March 2024

2023/24 GENERAL FUND BUDGET MONITORING - DETAIL
QUARTER 1

ACTUAL TO DATE			YEAR END FORECAST			
PROFIED BUDGET	ACTUAL TO DATE	VARIANCE TO DATE	APPROVED BUDGET	CURRENT OUTTURN FORECAST	FORECAST VARIANCE	
£	£	£	£	£	£	
5,776,765	2,974,479	(2,802,286)	TOTAL GENERAL FUND NET EXPENDITURE	25,703,650	25,910,980	207,330
Chief Executive						
540,391	474,523	(65,868)	IT SERVICES	2,191,990	2,191,990	0
191,508	181,172	(10,336)	STRATEGIC MANAGEMENT	801,820	781,630	(20,190)
(475)	(475)	0	AFFORDABLE HOUSING DEVELOPMENT	0	0	0
84,374	75,506	(8,868)	CENTRAL SUPPORT	342,390	351,180	8,790
129,478	44,210	(85,268)	ORGANISATIONAL CHANGE PROGRAMME	517,910	517,910	0
945,276	774,936	(170,340)	NET EXPENDITURE	3,854,110	3,842,710	(11,400)
City Development						
(438,479)	(372,922)	65,557	HOUSING NEEDS & HOMELESSNESS	1,803,770	1,855,190	51,420
0	0	0	SUNDRY LANDS MAINTENANCE	95,460	95,460	0
42,568	42,076	(492)	GF HOUSING - PROPERTY	173,440	175,940	2,500
(7,661)	(25,756)	(18,095)	BUILDING CONTROL & LAND CHARGES	56,060	57,410	1,350
213,186	220,604	7,418	PLANNING	1,336,410	1,368,370	31,960
319,000	213,154	(105,846)	LIVEABLE EXETER GARDEN CITY	1,276,000	1,276,000	0
128,614	77,156	(51,458)	NET EXPENDITURE	4,741,140	4,828,370	87,230
Communications, Culture and Leisure Facilities						
94,824	75,245	(19,579)	CULTURE	380,210	381,810	1,600
8,120	(1,070)	(9,190)	TOURISM	19,480	19,480	0
(115,317)	(428,111)	(312,794)	MARKETS & HALLS	(378,180)	(562,040)	(183,860)
609,055	251,727	(357,328)	MUSEUM SERVICE	2,764,840	2,487,190	(277,650)
852,789	534,937	(317,852)	LEISURE & SPORT	2,936,100	2,149,710	(786,390)
14,963	0	(14,963)	ST SIDWELLS POINT	59,850	59,850	0
18,209	12,808	(5,401)	VISITOR FACILITIES	77,250	71,600	(5,650)
57,029	54,262	(2,767)	COMMUNICATIONS	234,910	219,150	(15,760)
(189,133)	(189,339)	(206)	ACTIVE & HEALTHY PEOPLE	1,179,250	1,179,250	0
(543,633)	(579,446)	(35,813)	EXETER COMMUNITY GRANTS PROGRAMME	93,000	93,000	0
806,905	(268,987)	(1,075,892)	NET EXPENDITURE	7,366,710	6,099,000	(1,267,710)
Net Zero Exeter & City Management						
154,660	39,028	(115,632)	ENVIRONMENTAL PROTECTION	640,710	553,230	(87,480)
152,435	165,642	13,207	LICENCING, FOOD, HEALTH & SAFETY	725,810	904,300	178,490
(625,754)	(596,165)	29,589	PARKING SERVICES	(6,813,700)	(5,824,930)	988,770
117,931	86,330	(31,601)	WATERWAYS	541,270	666,630	125,360
203,470	84,254	(119,216)	ENGINEERING SERVICES	971,780	843,430	(128,350)
412,727	412,320	(407)	PARKS & GREEN SPACES	2,045,550	2,061,160	15,610
30,438	16,919	(13,519)	BEREAVEMENT SERVICES	109,980	139,650	29,670
383,213	339,391	(43,822)	STREET CLEANING	1,760,230	1,733,780	(26,450)
56,203	34,896	(21,307)	PUBLIC CONVENIENCES	232,420	203,250	(29,170)
683,745	528,537	(155,208)	DOMESTIC REFUSE COLLECTION	3,633,450	3,195,260	(438,190)
(246,961)	(265,934)	(18,973)	WASTE CHARGEABLE SERVICES	(800,160)	(193,500)	606,660
60,770	88,563	27,793	WASTE AND FLEET OVERHEADS	168,240	190,270	22,030
207,404	184,158	(23,246)	RECYCLING	710,720	736,480	25,760
145,094	63,540	(81,554)	NET ZERO AND BUSINESS	1,044,170	1,044,170	0
1,735,375	1,181,479	(553,896)	NET EXPENDITURE	4,970,470	6,253,180	1,282,710
Finance						
296,200	500	(295,700)	MAJOR PROJECTS	1,184,810	1,184,810	0
(696,068)	(1,159,940)	(463,872)	CORPORATE PROPERTY - ESTATES	(6,068,420)	(6,165,730)	(97,310)
281,086	99,614	(181,472)	CORPORATE PROPERTY - ASSETS	998,620	772,000	(226,620)
1,024,889	994,743	(30,146)	REVENUES, BENEFITS & CUSTOMER ACCESS	3,437,940	3,533,800	95,860
51,526	64,875	13,349	CORPORATE	206,120	273,380	67,260
399,186	383,707	(15,479)	UNAPPORTIONABLE OVERHEADS	1,308,410	1,308,410	0
167,513	225,633	58,119	FINANCIAL SERVICES	673,900	747,900	74,000
26,277	24,562	(1,715)	INTERNAL AUDIT	107,120	109,600	2,480
33,269	17,284	(15,985)	PROCUREMENT	136,170	133,100	(3,070)
1,583,879	650,978	(932,901)	NET EXPENDITURE	1,984,670	1,897,270	(87,400)
Corporate Services						
170,523	157,650	(12,873)	HUMAN RESOURCES	677,730	656,200	(21,530)
58,374	59,607	1,233	LEGAL SERVICES	227,380	267,020	39,640
93,526	82,473	(11,053)	ELECTIONS & ELECTORAL REG	376,300	376,300	0
165,337	157,936	(7,401)	DEMOCRATIC REPRESENTATION	665,000	671,970	6,970
60,504	62,838	2,334	CIVIC CEREMONIALS	342,220	348,840	6,620
28,453	63,055	34,602	CORPORATE SUPPORT	497,920	720,120	222,200
0	(24,641)	(24,641)	TRANSPORTATION	0	(50,000)	(50,000)
576,717	558,918	(17,799)	NET EXPENDITURE	2,786,550	2,990,450	203,900

PROPOSED SUPPLEMENTARY BUDGETS - QUARTER 1

Supplementary Budgets

Description	£	Funded by:
CAB Contribution	100,000	CIL
Community Buildings	15,000	CIL
Small Grants Fund	3,000	CIL
Planning - Temporary Staffing	50,000	Earmarked Reserve
NLHF - Dynamic Collections	247,708	Grant Funded
NLHF - Dynamic Collections	(247,708)	Grant Funded
RAMM - Mechanical Engineering consultancy support	26,910	General Fund
Highways - Contract with DCC	(82,740)	Self Financing
Highways team to provide DCC Service	82,740	Self Financing
Minor Works Team	108,300	Self Financing
Minor Works Team	(108,300)	Self Financing
Arboricultural Staffing	18,730	General Fund
Total	213,640	

Budget Transfers




Move Debt Collection Officer Post from Housing Needs & Homelessness to Revenues, Benefits & Customer Access 33,790





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2023/24 BUDGET MONITORING
AREAS OF BUDGETARY RISK

The table below notes service-areas that, based on either experience last year or market factors this year, have been identified as having significant budgetary risk within the 2023/24 revenue budgets.




The revenue budget areas of risk are:

Service	2023/24 Approved Budget	Risk Rating	Risk and mitigation
City Development			
Planning Services Revenue	£824,760		This year there have been a number of recent planning decisions which have been appealed some of which are very significant e.g. Heavitree Road, in addition there is a risk of at least one judicial review of a decision to approve planning. This generally results in a need for external consultancy and legal advice. Significant expenditure has been incurred in this area in previous financial years.
Communications, Culture and Leisure Facilities			
Markets & Halls (Revenue)	(£378,180)		The Matford Centre anticipates another successful year, with surplus to income expected from both Kivell's auctioneers and car parking revenue. There is also a small saving against utilities expected and this will monitored throughout the year to ensure the forecasts stay relevant. The surplus to budget is forecast at £183,860 at this time.
Museum Service (Revenue)	£2,764,840		The new establishment structure was approved during the Summer and it is anticipated that the reorganisation will be complete by Christmas 2023. This has led to in-year savings against staffing costs. As with other areas, a saving against utilities has also been forecast, leading to an overall forecast saving of £277,650 for the year.

Service	2023/24 Approved Budget	Risk Rating	Risk and mitigation
Leisure & Sport (Revenue)	£2,936,100		2023/24 is anticipated to be the first full year that all the centres will be open and operating at capacity, reflecting renewed confidence after the covid pandemic and despite of the cost in living crisis. However, as there is little historic data to compare with, a cautious approach has been taken in forecasting both membership growth (and therefore revenue) and the costs of maintaining older buildings. A £200,000 maintenance budget was added to the Assets team in 2023/24 but a delay in their team restructure has delayed them taking on responsibility for the centres. Therefore an underspend has been recorded in Corporate Property and an overspend in Leisure.
Net Zero Exeter and City Management			
Trade Waste Fees & Charges	(£1,604,640)		There has been a longstanding budget target with respect to Trade Waste which has not been achieved since it was set in 2017. The 2021/22 budget anticipated that ECC could secure some significant commercial waste contracts and so the income targets were further increased. Contracts with the University and Met Office last year improved performance to 76% of budget, but the service has struggled to close the gap any further.
Car Parking Fees & Charges	(£10,058,640)		The Covid pandemic has resulted in ongoing changes to parking, with some commuters working from home during the working week. The income from visitors can also be volatile during holiday periods. Comparing 2023 to 2019, footfall within the city remains 10% down.
Home Call Fees & Charges	(£352,800)		The Control Centre Operations, covering the Home Call Alarm Service and CCTV, have had some positive uptake in client numbers following the marketing campaigns which commenced back in March, but numbers are still below the income target set. The combined service are developing other income streams to offset the shortfall which will commence from Q2.

Service	2023/24 Approved Budget	Risk Rating	Risk and mitigation
Finance			
Revenues and Benefits Housing Benefit Subsidy	£32,720,940		The Council currently administers over £32 million of Housing Benefit payments for rent allowances and rent rebates. Not all expenditure can be claimed back as subsidy. Certain supported and temporary accommodation costs are not eligible for full subsidy; these claim types will remain in Housing Benefit and not move to Universal Credit. As more Housing Benefit claims move onto Universal Credit the amount of unsubsidised expenditure will be an increased proportion of total expenditure. Errors made by ECC officers are not subsidised in full if they go over a set percentage of total expenditure. As total expenditure reduces due to Universal Credit rollout, the margins within which error payments are subsidised will reduce, increasing the risk of a subsidy loss in this area.
Corporate Services			
Legal Services (Revenue)	£227,380		Revenue income has been adversely affected so far this financial year, with a significant reduction in work carried out for third parties. There is potential for a new revenue stream to be created but this is still in the planning stage so no forecast has been added at quarter one.
Corporate Support (Revenue)	£497,920		Vacant offices at the Civic Centre has caused a significant reduction in rental income and any new tenants which may take up residency are unlikely to make any material impact on this shortfall. There has been a forecast saving against the utilities budget – this will continue to monitored and updated if necessary.

Risk Rating Key:

	<p>Current forecasts indicate either a favourable variance compared to the budget or no variance at all</p>
	<p>Current forecasts indicate an adverse budgetary variance of between 0% and 5% that will be kept under review</p>
	<p>Current forecasts indicate an adverse budgetary variance of more than 5% and will be monitored closely</p>

Service	Description/Proposal	2023/24 Budget Reduction/ (increase)	Outturn Forecast	Variance (shortfall)	Comment
PA Team	Remove 2 vacant posts / merge with LM support	£43,210	£43,210	£0	Post removed therefore saving achieved
Guildhall Chambers	Reduce Mace Sergeants (reduction 60%)	£17,730	£16,930	(£800)	Forecast subject to pay award
Green Accord	Green Accord - additional income	£3,000	£0	(£3,000)	Budget has been increased, but no sign as yet that actuals are increasing to meet extra target
Net Zero & Business Admin	Removal of small budgets	£1,400	£1,400	£0	No forecast spend
Business Projects	Removal of skills function and budgets - replaced by management of UKSPF project for 3 years. Building Greater Exeter - funded from UKSPF (2 years)	£83,740	£83,740	£0	Cost centre will not overspend - likely to be benefit at y/e
Commercialisation	Removal of temporary post	£54,700	£54,700	£0	Post removed therefore saving achieved
Highways	Removal of budget paying DCC for improved maintenance	£34,550	£15,000	(£19,550)	Renegotiated DCC contract
Arts & Events	Removal of part of budget to fund other NPO organisations	£100,000	£90,000	(£10,000)	£10k supplementary added in quarter 1
Exeter Corn Exchange	Design events programme to break even	£35,660	£35,660	£0	Budget to be met therefore saving to be achieved
Communications & Marketing Tourism	Marketing income budget	£369,670	£319,080	(£50,590)	No longer saving from post deletion
	SUB TOTAL DISCRETIONARY SERVICE REDUCTIONS	£743,660	£659,720	(£83,940)	
Public and Green Spaces	Engineering pay capitalisation	£36,750	£36,750	£0	Staff being recruited to structure during quarter, no activity to capitalise as of Q1
Corporate Property	Assets restructure	£65,500	£65,500	£0	The Assets team restructure is still on-going and is unlikely to be in place by the end of the calendar year. The combined in-year savings in both T104 and T270 due to staff vacancies is forecast to exceed £65,500 as recruitment has been put on hold.
Revenues, Benefits and Customer Access	Move HB Overpayment Collection back to Benefits. Restructure; Delete 3 vacant posts, regrade 1 post, create 2 x technical posts	£27,310	£27,310	£0	Budget removed and saving is achievable
Corporate Property	Estates reduced admin support	£11,550	£11,550	£0	Balance removed; saving achieved
Executive Support	Terminate subscription for Exeter Data Mill and reduce public transport budget	£10,250	£10,250	£0	Subscription not renewed therefore saving achieved
Public & Green Spaces	Technical support reduction; reduce one vacant post. Facilities; 85% reduction travellers and camper costs, aboriculture sub-contractor cost reductions, 8% reduction in sub-contractor costs based on spend analysis	£55,760	£55,760	£0	Post removed from establishment structure
Democratic & Civic Support	Smooth Elections budget to reflect variable cost over 4 years	£48,750	£48,750	£0	Forecast £90,870 overspend, but budget variances to be managed via movements to/from reserves as budgets smoothed over MTFP
Democratic & Civic Support	Stop undertaking empty property canvass	£2,800	£2,800	£0	Currently forecast to stay within remaining budget
Democratic & Civic Support	Recharges to self-financing services to cover meetings; Tax Forum and Council Housing Advisory Board	£3,750	£3,750	£0	To be recharged at year end
Democratic & Civic Support	Remove vending machines in the Civic Centre	£2,600	£2,600	£0	Currently, savings forecast to be met. However, pending the outcome of contract payments/negotiations
Revenues, Benefits and Customer Access	1 x post accepted voluntary redundancy	£13,300	£13,300	£0	Budget removed and saving is achievable
Exchequer and Accountancy	Minor budget reductions (stationery, public transport, seminar costs)	£2,250	£2,250	£0	No forecasted overspend on remaining budget; saving achieved
Exchequer and Accountancy	Financial support service costs to be met from Guildhall Shopping Centre surplus that would otherwise be for capital purposes	£27,550	£27,550	£0	To be retained from Guildhall surplus
Exchequer and Accountancy	Reinstate 0.60 FTE Finance Technician (deleted in 2022/23 budget cycle)	(£19,596)	(£12,100)	£7,496	Post occupied from 16/08/2023 therefore £7.5k savings against budget (this includes pay award)
Corporate Property	Estates additional fees; EBC and ECQT	£8,000	£8,000	£0	Included in annual charge; saving achieved
Corporate Property	New rental income stream from acquisition of 83 Fore Street	£45,500	£45,500	£0	No adverse forecast to budget; saving achieved
Housing Needs and Homelessness	Reduction in Housing Options budgets, including Sanctuary scheme and storage and removals	£3,000	£3,000	£0	Budget removed and saving is achievable
Housing Needs and Homelessness	Reduction in Housing Options budgets, including Sanctuary scheme and storage and removals	£2,500	£2,500	£0	Budget removed and saving is achievable
Housing Needs and Homelessness	Reduction in Temporary Accommodation budgets, various budget headings relating to Glencoe, Haven, Queens Rd:	£23,500	£23,500	£0	Budget removed and saving is achievable
City Development	Delete vacant post	£35,460	£35,460	£0	Budget removed and saving is achievable
City Development	Delete part-time post	£15,290	£15,290	£0	Budget removed and saving is achievable
City Development	Create Enforcement Officer post	(£54,290)	(£54,290)	£0	Budget created
City Development	Utilise Planning uplift income, through reduction in budget for miscellaneous expenditure to meet cost of Enforcement Officer post	£39,000	£39,000	£0	Budget removed and saving is achievable
City Development	Reduction on other expenses budget	£21,130	£21,130	£0	Budget removed and saving is achievable
City Development	Increase Service Lead salary allocation to Land Charges from 10% to 25%	£12,290	£12,290	£0	Budget removed and saving is achievable
City Development	Minor budget reductions	£8,490	£8,490	£0	Budget removed and saving is achievable
Legal	Remove 2 vacant posts	£32,800	£32,800	£0	Budget removed therefore saving achieved
Legal	Change in Property Lawyer role (increase hour)	(£7,400)	(£7,400)	£0	Hours increased for new PL role; recruited into
Legal	Change in Litigation Lawyer role (increase hours)	(£7,400)	(£7,400)	£0	Hours increased for new LL; recruited into
Legal	Minor budget reductions (car mileage, mobile phones and Hays DX)	£3,094	£3,094	£0	Budget removed and saving is achievable
Recycling & Fleet	Not procuring 3 food waste vehicles following rationalisation of rounds - saving in fleet hire costs (C050 54006), leaving 5 vehicles	£90,000	£90,000	£0	Budget reduction effected, likely to underspend remaining budget
Recycling & Fleet	Revenue saving from capitalising of lease costs (maintenance and interest charges) from 3 existing food waste vehicle	£20,490	£20,490	£0	Further investigations to be performed and reported back in Quarter 2 update
Environmental Health and Community Safety	Noise recharge to HRA for assistance with cases/contribution to equipment maintenance	£2,500	£2,500	£0	Recharges to be processed
Environmental Health and Community Safety	Deletion of vacant post	£26,690	£26,690	£0	Post removed from structure
Environmental Health and Community Safety	Re designation of Technician role	£7,010	£7,010	£0	Current forecast within reduced budget
Environmental Health and Community Safety	Salary realignment following changes in duties of staff to licence related income work	£20,000	£20,000	£0	Significant churn of staff has occurred - some agency cover has been necessary which has dampened down savings. Some risk that saving will be at this stage of year, but will be closely monitored and updated in Quarter 2
Public and Green Spaces	Play area sub-contractor budget reductions, removal of 35% of sub-contractor budget will result in play offering minimal remedial maintenance only. Site development and equipment replacement costs will be capital or S106 dependent	£34,000	£34,000	£0	Service will live within restricted means and use capital / s106 money where available

Service	Description/Proposal	2023/24 Budget Reduction/ (increase)	Outturn Forecast	Variance (shortfall)	Comment
Public and Green Spaces	Street cleansing redesign	£101,850	£85,624	(£16,226)	Budget has been withdrawn - Q1 forecast shows that just behind achieving this at this early stage of the year
Public and Green Spaces	Reduce grass maintenance provision, reduction of 2 vacant posts	£48,900	£44,850	(£4,050)	Post removed - shortfall of £4,050 can be attributed to 23/24 pay award offer excess cost
Housing Needs and Homelessness	0.30 FTE Housing Casework officer vacancy to be funded by Homeless Prevention Grant (50% of 0.60 FTE).	£12,850	£12,850	£0	Budget removed and saving is achievable
Markets & Halls and Visitor Facilities	Additional income at Matford Centre	£8,500	£8,500	£0	Budget to be met therefore saving to be achieved
Legal	Reduce agency from £66k to £61k budget used to perform work for recharging to third parties (ECL), whilst maintaining income at £87k	£5,000	£5,000	£0	No forecast overspend on agency staff. However, forecast income for recharges to third parties has been significantly reduced due to reduction in work from ECL. There is potential for a new revenue stream to be created but this is still in the planning stage therefore no forecast has been included at quarter 1.
Environmental Health and Community Safety	Energy Company Obligation (ECO) income from declarations	£15,000	£5,000	(£10,000)	Income very slow to start coming in on this - only 5 referrals YTD, 3 of which were actually in March. Target is 150
Net Zero and Business	Reduce discount from 75% to 60% for standard price season tickets	£137,340	£0	(£137,340)	Lower demand for season tickets due to an increase in individuals working from home. Season ticket offer currently under review to provide better options to season ticket holders
Net Zero and Business	Cease discounted season parking business permit	£71,270	£0	(£71,270)	Delayed full implementation, but reducing discount on a phased basis. Financial impact to be closely monitored and reported back in future quarterly updates
Net Zero and Business	Review the use of events being held in car parks, currently provided FOC and no policy	£5,000	£0	(£5,000)	Delayed implementation, now expected in January 2024
Net Zero and Business	Charge for the electricity used by EV in public car parks at 30p pkwh	£28,180	£23,180	(£5,000)	Budget created but very slow take up - only £315 YTD. Expected to pick up with future months as billed in arrears and May was only a half month with charges not being notified until mid-month.
	SUB TOTAL SERVICE REVIEW REDUCTIONS	£1,104,068	£862,678	(£241,390)	
Car Park income	Rezoning car parks, evening and night time parking charge	£872,080	£632,405	(£239,675)	Car park income behind profile and will be subject to close monitoring by officers. Contributing factors include a reduction in commuter parking and competition arising from reduced bus fares
Car Park income	Budget to improve car parks	(£72,080)	(£72,080)	£0	Budget increased as planned
Management Team Reductions	Initial reductions in the top levels of management within the Council	£268,997	£256,600	(£12,397)	One senior manager remained in post until May
Management Team Reductions	Maintain budget for support with elections	(£20,000)	(£20,000)	£0	Forecast to be used in year to provide support
Active & Healthy Staff Costs	Sport England to fund Programme Lead post (3 years)	£82,600	£82,600	£0	Budget removed and saving is achievable
RAMM	RAMM - Delete Vacant post	£13,480	£13,480	£0	Post deleted therefore savings achieved
Strata Data	Strata Data Centre Costs, charge EDDC & TDC for proportion of energy costs	£56,688	£56,688	£0	To be invoiced shortly; saving achieved
	OTHER PROPOSALS	£1,201,765	£949,693	(£252,072)	
	TOTAL	£3,049,493	£2,472,091	(£577,402)	

REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

REPORT TO COUNCIL

Date of Meeting: 17 October 2023

Report of: Director Finance

Title: 2023/24 General Fund Capital Monitoring Statement – Quarter 1

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

To report the current position in respect of the Council's revised annual capital programme and to advise Members of the anticipated level of deferred expenditure into future years.

The report seeks Member approval to amend the annual capital programme in order to reflect the reported variations.

2. Recommendations:

It is recommended that Executive Committee supports and recommends to Council to approve:

- (1) The overall financial position for the 2023/24 annual capital programme.
- (2) The amendments and further funding requests to the Council's annual capital programme for 2023/24.

3. Reasons for the recommendation:

3.1. Local authorities are required to estimate the total of capital expenditure that it plans to incur during the financial year when it sets the prudential indicators for capital expenditure. This shows that its asset management and capital investment strategies are affordable, prudent and sustainable.

Capital expenditure is a significant source of risk and uncertainty since cost variations, delays and changing specifications are often features of large and complex capital projects.

In order to manage the risks associated with capital programming the annual capital programme is updated every three months to reflect any cost variations, slippage or acceleration of projects.

4. What are the resource implications including non financial resources

The financial resources required are set out in the body of this report.

5. Section 151 Officer comments:

Continuing the trend of recent years, only a small amount of the capital programme has been spent. Whilst progress has been made in addressing staff shortages, they will take time to bed in and therefore it is likely this trend will continue throughout the year.

6. What are the legal aspects?

Monitoring of capital expenditure is required in order to comply with the provisions of the Local Government Act 2003.

The requirements imposed on the Council by the Act are set out in section 3 of the report.

7. Monitoring Officer's comments:

This is a financial update report and as such the Monitoring officer has no comment to make.

8. Report details:

8.1. REVISIONS TO THE CAPITAL PROGRAMME

The 2023/24 Capital Programme, including commitments brought forward from 2022/23, was last reported to Executive on 27 June 2023. Since that meeting the following changes have been made that have increased the programme:

Description	£	Approval/Funding
Capital Programme, as reported to Council 18 July 2023	62,483,270	
Riverside & RAMM Decarbonisation Projects	6,391,660	Approved by Council 18 July 2023
DEFRA Air Quality Grant	49,000	
RAMM Roof & Insulation	498,000	
Fleet Lease Costs	750,000	
Revised Capital Programme	70,171,930	

8.2. PERFORMANCE

The revised capital programme for the current financial year is £70.172 million. During the first three months of the year the Council spent £1.486 million on the programme,

which equates to 2.12% of the revised programme. This compares with £46.772 (35.06%) that was spent in the first three months of 2022/23.

The current programme is detailed in Appendix 1. The Appendix shows a total forecast spend for 2023/24 of £42.155 million with £28.025 million of the programme potentially being deferred to 2024/25 and beyond.

Appendix 2 shows the approved budgets for 2024/25 with the proposed 2023/24 budget to be carried forward to 2024/25 and beyond for Executive and Council to consider for approval.

8.3. AVAILABLE CAPITAL RESOURCES

The available capital resources for the General Fund for 2023/24 are £17.020 million. An estimated spend of £42.155 million is required of which £26.628 million will be funded from borrowing with £1.493 million capital receipts carried forward to 2024/25.

Appendix 4 sets out the forecast use of the resources available for the General Fund and the likely amounts of borrowing that will be necessary to fund the capital programme over the next three years.

The value of actual capital receipts received in the quarter in respect of the General Fund are:

	General Fund £
Balance as at 1 April 2023	2,948,571
New Receipts	0
Balance as at 30 June 2023	2,948,571

8.4. EXPENDITURE VARIANCES

The main (greater than +/- £30k) variances and issues concerning expenditure are as follows:

Scheme	Variance £
Heavitree Paddling Pools	60,000
St Thomas Splash Pad	(60,000)
<p>Officer Responsible: Service Manager - Parks & Green Spaces</p> <p>It is proposed that these schemes be considered as a single project, with a combined budget. Work at the St Thomas site has been completed and it is proposed that the remaining funds be allocated towards the completion of the Heavitree site project.</p>	

Scheme	Variance £
Leisure Equipment Replacement Programme	561,660
Leisure Centre Essential Enhancements	(316,220)
Leisure Management	(245,440)
Riverside & RAMM Decarbonisation Projects	900,160

Officer Responsible: Director - Communications, Culture & Leisure

It is proposed that the Leisure programmes are combined to reflect the on-going annual requirements of updating equipment across the leisure centres.

As below, it is proposed that the saving from the Riverside Sports Hall Roof budget is transferred to the Riverside & RAMM Decarbonisation Project as the Council's contribution to the programme.

Scheme	Variance £
Riverside Sports Hall Roof	(900,160)

Officer Responsible: Director - Communications, Culture & Leisure

This underspend represents a transfer to the new Riverside & RAMM Decarbonisation Project, managed by the Net Zero Team; this is the Council's contribution to this programme. £76,000 remains in the Riverside Roof programme to cover the final retention payment.

8.5. SCHEMES TO BE DEFERRED TO 2024/25 AND BEYOND

Schemes which have been identified as being wholly or partly deferred to 2024/25 and beyond are:

Scheme	Budget to be Deferred £
Outdoor Leisure Facilities	121,270
Parks Infrastructure	105,210
Cemeteries & Churchyards Infrastructures	134,790
Ash Die Back Tree Replacement	201,700
Northbrook Wild Arboretum	78,350
Heavitree Paddling Pools	350,000
<p>Officer Responsible: Service Manager - Parks & Green Spaces</p> <p>A site for proposed facilities within the Newcourt area is still to be determined. Rougemont footpath improvements are likely to start in the new year extending into 2024/25.</p> <p>The Garden of Remembrance scheme is not expected to start in the current year.</p> <p>Work is ongoing to assess and remove affected trees and replant with other varieties. It will continue through the medium term, dependent on disease impact and funding.</p> <p>Arboretum deferral relates to costs associated with years 3 to 5 of this scheme.</p> <p>Tendering for the Paddling Pools scheme should be issued next month with work due to start in the new year and with the majority of spend falling in 2024/25.</p>	
Bowling Green Marshes	260,000
Cricklepit Bridge	113,750
Trews Weir Refurbishment	3,475,000
District Street Lighting	577,390
Exeter Quay Cellars Cliff Face	385,000
Farm Hill Retaining Walls	464,790
Riverside Walls at Quay	50,000
Bonhay Road / Andlaw House Footpath	130,000
St James' Weir & Duckes Marsh Meadow Banks	75,000
Landfill Gas Extraction Systems	200,000
Mincinglake Valley Park Reed Beds & Pipe Inlet	150,000
Bromham's Farm Playing Fields	223,530
ECC Bridge Repair Programme	600,000
Countess Wear Retaining Wall Rebuild	100,000
Canal Basin Bridge Refurbishment	50,000

Officer Responsible: Engineering and Assets Manager

Bowling Green Marshes work is expected to commence in the autumn running across year end.

Cricklepit Bridge work expected to commence in the autumn and run over year end.

The Trews Weir Refurbishment has an incorrect spend profile – only £75k this year, £500k next and with the bulk due to be spent in 2025/26.

District Street Lighting – pace of work dependent on DCC and availability of supplies.

Exeter Quay Cellars – designs being finalised and Listed Buildings Consent to be submitted September/October 2023. Due to materials constraints, substantive works cannot start until March 2024 and will run through to 2024/25.

Farm Hill Retaining Walls – on-going review to determine what is ECC’s responsibility; work will not to start before the new year.

Riverside walls at Quay is linked to the Trews Weir Refurbishment and is likely to be spent when the majority of that work takes place (i.e. 2025/26).

Bonhay Road / Andlaw House timescales are dependent on a third party; and are unlikely to commence until the new year at the earliest.

Duckes Marsh and Canal Basin Bridge are contingency pots where it is hoped not to need to spend anything during the year.

Landfill gas extraction – further winter monitoring to occur before a decision is taken on the way forward for this scheme.

Mincinglake Valley timescales dependent on a third party, limited spend in year.

Bromham’s Farm fields - to commence April/May 2024 with tendering due shortly.
Bridge Repair programme – little requirement anticipated this year.

Countess Wear Wall – forecast to start in the new year and continue into early 2024/25.

Decarbonisation Projects

6,041,820

Officer Responsible: Service Lead – Net Zero & Business

Project has a 2 year time frame and strict rules on when expenditure can be incurred, the majority of the project is scheduled for year 2 – 2024/25.

Scheme	Budget to be Deferred £
Loan to Exeter City Living	14,141,560
<p>Officer Responsible: Chief Financial Officer</p> <p>It is unlikely that this loan will be utilised in 2023/24, therefore it is to be deferred into the next financial year.</p>	

8.6. ACHIEVEMENTS

Guildhall Roof Replacement

The Jury Room, located within the historic Guildhall, suffered a collapsed ceiling due to water ingress. This project has replaced the slate roof covering, upgraded insulation, re-plastered the damaged interior elements and restored the original vaulted ceiling. With the scaffold already in place the Robing room roof was re-covered as well. Completing this project provides a robust venue for civic ceremonial and other events and protects an important heritage asset.

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

The Capital Programme contributes to all of the key purposes, as set out in the Corporate Plan.

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

Areas of budgetary risk are highlighted to committee as part of the quarterly budget monitoring updates.

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 impact of each scheme is considered prior to approval. Any significant deviation from this will be noted within the body of this report.

12. Carbon Footprint (Environmental) Implications:

We are working towards the Council's commitment to carbon neutral by 2030. The impact of each scheme is considered prior to approval.

13. Are there any other options?

There are no other options.

Director Finance, Dave Hodgson

Author: Nicola Morley, Mark Neville-Smith and Bridget Kendrick

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

Background papers used in compiling this report:-

None

Contact for enquires:
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2023/24 CAPITAL MONITORING - QUARTER 1

Responsible Officer	Scheme	Total 2023/24	2023/24 Spend	2023/24 Forecast	2023/24 Budget to	2023/24
		Capital Programme	Quarter 1	spend	be Carried Forward	Programme
		£		£	to 2024/25 and	Variances
					Beyond	(Under)/Over
						£
Chief Executive						
	Customer Contact Platform	161,030	0	161,030	0	0
	Annual Contribution to Strata	53,910	53,904	53,904	0	(10)
	ECC Civic Centre HFX Door Access Replacement	100,000	0	100,000	0	0
	System Upgrade Cost 2012 Server replacement	15,720	0	15,720	0	0
	GIS Cloud Migration	2,510	0	0	0	(2,510)
	IT Replacement Programme	50,000	0	50,000	0	0
	Idox System for Planning	60,680	0	60,680	0	0
Chief Executive	Financial Management	355,680	0	355,680	0	0
	Datacentre Relocation	35,940	0	35,940	0	0
	NCSC Zero Trust	53,910	0	53,910	0	0
	PSTN Replacement	30,000	0	30,000	0	0
	Microsoft Purview	9,000	0	9,000	0	0
	Microsoft Power Apps	35,930	0	35,930	0	0
	Software Upgrade	28,750	0	28,750	0	0
	Sharegate	5,750	0	5,750	0	0
TOTAL		998,810	53,904	996,294	0	(2,520)
Net Zero Exeter and City Management						
	Parks Infrastructure	155,210	0	50,000	105,210	0
	Cemeteries & Churchyards Infrastructure Improvements	134,790	0	0	134,790	0
	Parks Anti-Intrusion Measures	14,900	785	14,900	0	0
	Ash Die Back Tree Replacement	301,700	11,925	100,000	201,700	0
	Northbrook Wild Arboretum	288,580	0	288,580	0	0
Service Manager - Public & Green Space	Play Areas	316,990	38,406	316,990	0	0
	Outdoor Leisure Facilities - Newcourt	121,270	0	0	121,270	0
	Pinhoe Playing Field Upgrades	42,050	0	27,500	14,550	0
	Heavitree Paddling Pools	468,150	0	118,150	410,000	60,000
	St Thomas Splashpad	100,000	39,465	40,000	0	(60,000)
	Bowling Green Marshes Coastal Defence Scheme	310,000	0	50,000	260,000	0
	Cricklepit Bridge	153,750	0	40,000	113,750	0
	Trews Weir refurb	3,550,000	0	75,000	3,475,000	0
	District Street Lighting	777,390	0	200,000	577,390	0
	Piazza Terracina	1,060	0	1,060	0	0
	Exeter Quay Cellars cliff face	513,930	8,640	128,930	385,000	0
	Farm Hill Retaining Walls (23 no.)	564,790	0	100,000	464,790	0
	Riverside Walls at Quay	50,000	0	0	50,000	0
	Bonhay Rd/Andlaw House Footpath	150,000	0	20,000	130,000	0
Engineering & Assets Manager	St James' Weir & Ducks Marsh Meadow banks	75,000	0	0	75,000	0
	Landfill Gas Extraction Systems	270,000	8,050	70,000	200,000	0
	Mincinglake Valley Park Reed Beds & Pipe Inlet	182,600	0	32,600	150,000	0
	Bromhams Farm Playing Fields	263,530	4,000	40,000	223,530	0
	Longbrook Street wall behind 30-38	5,000	0	5,000	0	0
	ECC Bridge Repair Programme	750,000	0	150,000	600,000	0
	Countess Wear Retaining Wall Rebuild	150,000	1,950	50,000	100,000	0
	Oxford Road Car Park Retaining Wall	200,000	0	200,000	0	0

Responsible Officer	Scheme	Total 2023/24	2023/24 Spend	2023/24 Forecast	2023/24 Budget to	2023/24
		Capital Programme				
		£			to 2024/25 and	Variations
					Beyond	(Under)/Over
					£	£
	Canal Basin Bridge Refurbishment	50,000	0	0	50,000	0
	Bank Repairs & Stabilisation to Watercourses	20,000	0	20,000	0	0
Service Manager - Recycling, Waste & Fleet	Waste Infrastructure	451,410	7,075	451,410	0	0
	Improved recycling containers	211,360	0	211,360	0	0
	Enhance the Materials Reclamations Facility	4,059,370	13,500	4,059,370	0	0
	Fleet Lease costs	927,200	0	927,200	0	0
Service Manager - Environmental Health & Community Safety	Disabled Facility Grants	1,652,120	601,359	1,652,120	0	0
	CCTV improvements	188,280	122,384	188,280	0	0
	DEFRA Air Quality Grant	49,000	0	49,000	0	0
	Noise Monitoring Equipment	45,000	0	45,000	0	0
Harbour Master	Exeter Canal Bank Repairs	76,890	0	76,890	0	0
	Harbour Team Workboat	23,080	0	23,080	0	0
Service Manager - Net Zero & Business	Energy Saving Projects	0	1,095	7,641	0	7,641
	Improved Car Park Security Measures at King William Street & Arena Park	19,670	0	19,670	0	0
	Riverside & RAMM Decarbonisation Projects	6,391,660	0	1,250,000	6,041,820	900,160
	Shared Prosperity Fund	44,890	0	44,890	0	0
Miscellaneous	Capitalised Staff Costs	281,700	0	281,700	0	0
TOTAL		24,402,320	858,633.73	11,426,322	13,883,800	907,801
City Development, Housing & Supporting People						
Director	Next Steps/Rough Sleepers Accommodation Programme Property Acquisitions	517,930	431,987	517,930	0	0
TOTAL		517,930	431,987	517,930	0	0
Communications, Culture and Leisure Facilities						
Director	Council Signage Improvement	79,090	0	79,090	0	0
	Leisure Centre Essential Enhancements	316,220	0	0	0	(316,220)
	Riverside Leisure Centre	50,480	11,941	50,480	0	0
	Riverside Sports Hall Roof	976,160	0	76,000	0	(900,160)
	Leisure Complex - Fit Out	495,250	0	495,250	0	0
	Leisure Management	245,440	0	0	0	(245,440)
	Leisure Complex - Build Project	739,140	0	739,140	0	0
	Bus Station Construction	242,370	0	242,370	0	0
	Leisure Property enhancements	2,126,800	0	2,126,800	0	0
	Leisure Equipment Replacement Programme	100,000	7,760	661,660	0	561,660
	Pinhoe Community Hub	1,276,470	0	1,276,470	0	0
TOTAL		6,647,420	19,701	5,747,260	0	(900,160)
Finance						
Director	Loan to Exeter City Living	14,141,560	0	0	14,141,560	0
	Commercial Property Purchase	10,951,220	50,000	10,951,220	0	0
	Civic Centre Air Conditioning Replacement	25,000	0	25,000	0	0
	Fire Risk Assessment Works	1,700,690	0	1,700,690	0	0
	Exmouth Buoy Store	212,720	0	212,720	0	0
	Leighton Terra & KW St MSCP	618,000	0	618,000	0	0
	Civic Centre Phase 3 Roof Rep	229,510	0	229,510	0	0
	City Wall	489,960	0	489,960	0	0
	Backlog Maintenance	508,810	0	508,810	0	0
	BLRF - Bonhay Meadows	1,003,850	0	1,003,850	0	0
	BLRF - Exeter Canal Basin	594,120	0	594,120	0	0
	BLRF - Mary Arches Car Park	1,295,740	0	1,295,740	0	0

Responsible Officer	Scheme	Total 2023/24 Capital Programme	2023/24 Spend Quarter 1	2023/24 Forecast spend	2023/24 Budget to be Carried Forward to 2024/25 and Beyond	2023/24 Programme Variances (Under)/Over
		£		£	£	£
City Surveyor	BLRF - Belle Isle	667,170	0	667,170	0	0
	BLRF - Cath & Quay Car Park	2,351,130	0	2,351,130	0	0
	BLRF - Clifton Hill	225,000	0	225,000	0	0
	Depot Relocation	375,970	0	375,970	0	0
	BLRF - Lower Wear Road	293,390	0	293,390	0	0
	Guildhall roof replacement	91,420	68,998	95,032	0	3,612
	RAMM - roof replacement	697,320	2,873	697,320	0	0
	Cathedral Green Display Cases	35,000	0	35,000	0	0
	Topsham Museum	150,000	0	150,000	0	0
	Commercial Property Ancillary Accommodation flat roof recovering	142,600	0	142,600	0	0
	Wat Tyler House - resolving ongoing water ingress with new rainwater system	277,270	0	277,270	0	0
	Commercial Properties - capital improvements to enable ongoing income (compliance with EPC legislation)	30,000	0	30,000	0	0
	RAMM Roof Repair & Insulation	498,000	0	498,000	0	0
	TOTAL		37,605,450	121,871	23,467,502	14,141,560
GENERAL FUND SERVICES TOTAL		70,171,930	1,486,096	42,155,308	28,025,360	8,734

BUDGETS CARRIED FORWARD TO 2024/25 AND BEYOND

Responsible Officer	Scheme	2024/25 Budget as per Budget Book/Council Approvals	Proposed Budget to be Carried Forward to 2024/25 and Beyond at Qtr 1	Budget Reprofiled to Future Years	Total 2024/25 Capital Programme	2025/26 Budget as per Budget Book/Council Approvals
		£	£	£	£	£
Chief Executive						
Chief Executive & Growth Director	Annual Contribution to Strata	53,910	0		53,910	53,910
	IT Replacement Programme	50,000	0		50,000	50,000
TOTAL		103,910	0	0	103,910	103,910
Net Zero Exeter and City Management						
Service Manager - Public & Green Space	Parks Infrastructure		105,210		105,210	
	Cemeteries & Churchyards Infrastructure Improvements		134,790		134,790	
	Ash Die Back Tree Replacement		201,700		201,700	
	Play Areas	225,000	0		225,000	200,000
	Outdoor Leisure Facilities - Newcourt		121,270		121,270	
	Pinhoe Playing Field Upgrades		14,550		14,550	
	Heavitree Paddling Pools		410,000		410,000	
Engineering & Assets Manager	Bowling Green Marshes Coastal Defence Scheme	160,000	260,000		420,000	
	Cricklepit Bridge		113,750		113,750	
	Trews Weir refurb		3,475,000	(2,975,000)	500,000	2,975,000
	District Street Lighting	168,750	577,390		746,140	
	Piazza Terracina	157,500	0		157,500	
	Exeter Quay Cellars cliff face		385,000		385,000	
	Farm Hill Retaining Walls (23 no.)	281,250	464,790		746,040	
	Riverside Walls at Quay		50,000	(50,000)	0	50,000
	Bonhay Rd/Andlaw House Footpath		130,000		130,000	
	St James' Weir & Ducks Marsh Meadow banks		75,000		75,000	
	Landfill Gas Extraction Systems		200,000		200,000	
	Mincinglake Valley Park Reed Beds & Pipe Inlet		150,000		150,000	
	Bromhams Farm Playing Fields		223,530		223,530	
	ECC Bridge Repair Programme		600,000		600,000	
Service Manager - Environmental Health & Community Safety	Disabled Facility Grants	800,000	0		800,000	800,000
Service Manager - Net Zero & Business	Riverside & RAMM Decarbonisation Projects		6,041,820		6,041,820	
	Shared Prosperity Fund	178,550	0		178,550	
Miscellaneous	Capitalised Staff Costs	150,000	0		150,000	150,000
TOTAL		2,121,050	13,883,800.00	(3,025,000)	12,979,850	4,175,000
Communications, Culture and Leisure Facilities						
Director	Leisure Equipment Replacement Programme	100,000	0		100,000	100,000
TOTAL		100,000	0	0	100,000	100,000
Finance						
Director	Loan to Exeter City Living		14,141,560		14,141,560	
City Surveyor	Guildhall MSCP		0		0	883,400
	John Lewis MSCP	424,400	0		424,400	
	Princesshay 2 MSCP	424,400	0		424,400	
	Backlog Maintenance	64,790	0		64,790	
	Commercial Properties - capital improvements to enable ongoing income (compliance with EPC legislation)	40,000	0		40,000	50,000
TOTAL		953,590	14,141,560	0	15,095,150	933,400
GENERAL FUND SERVICES TOTAL		3,278,550	28,025,360	(3,025,000)	28,278,910	5,312,310

GENERAL FUND AVAILABLE RESOURCES

GENERAL FUND	2023-24 £	2024-25 £	2025-26 £	2026-27 £	TOTAL £
CAPITAL RESOURCES AVAILABLE					
Capital Receipts Brought Forward	2,948,571				2,948,571
GF Capital Receipts	1,073,555	0	0	0	1,073,555
Revenue Contributions to Capital Outlay	258,080	468,750	0	0	726,830
Disabled Facility Grant	1,652,115	800,000	800,000	800,000	4,052,115
Community Infrastructure Levy	1,827,319	285,000	200,000	0	2,312,319
Other - Grants/External Funding/Reserves/S106	9,260,721	6,713,311	425,000	0	16,399,032
Total Resources Available	17,020,362	8,267,061	1,425,000	800,000	27,512,423
GENERAL FUND CAPITAL PROGRAMME					
Capital Programme	70,171,930	3,278,550	2,287,310	1,153,910	76,891,700
Overspends/(Savings)	8,734				8,734
Slippage	(28,025,360)	25,000,360	3,025,000		0
Total General Fund	42,155,304	28,278,910	5,312,310	1,153,910	76,900,434

UNCOMMITTED CAPITAL RESOURCES:					
Capital Receipts Brought Forward	2,948,571	1,493,182	1,289,272	1,085,362	2,948,571
Resources in Year	14,071,791	8,267,061	1,425,000	800,000	24,563,852
Less Capital Receipts to carry forward	(1,493,182)	(1,289,272)	(1,085,362)	(881,452)	(4,749,268)
Less Spend in Year	(42,155,304)	(28,278,910)	(5,312,310)	(1,153,910)	(76,900,434)
Borrowing Requirement	26,628,124	19,807,939	3,683,400	150,000	50,269,463

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REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

REPORT TO COUNCIL

Date of Meeting: 17 October 2023

Report of: Director Finance

Title: 2023/24 HRA Budget Monitoring Report – Quarter 1

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

To advise Members of the financial position of the HRA Revenue and Capital Budgets for the 2023/24 financial year after three months.

In addition to the budgetary over/under-spends reported to this committee, Appendix 1 also highlights areas of risk, so that Members are aware that certain budgets have been identified as being vulnerable to factors beyond the control of the Council, which may result in potential deviations from budget, and are therefore subject to close monitoring by officers.

2. Recommendations:

It is recommended the Executive note the report and Council notes and approves (where applicable):

- (1) the HRA forecast financial position for 2023/24 financial year; and
- (2) the revision of the HRA Capital Programme to reflect the reported variations detailed in Appendix 4

3. Reasons for the recommendation:

3.1 To formally note the HRA's projected financial position and to approve the reported variations to the HRA Capital Programme.

The Housing Revenue Account is a statutory account and local housing authorities have a duty to keep a HRA in accordance with proper accounting practices and to review the account throughout the year. Members are presented with a quarterly financial update in respect of the HRA and this is the first update for 2023/24.

4. What are the resource implications including non financial resources

4.1 The financial resources required to deliver both housing services to Council tenants and to invest in new and existing housing stock during 2023/24 are set out in the body of this report.

The impact on the HRA's available financial resources are set out in Appendix 3.

5. Section 151 Officer comments:

5.1. There is nothing significant to draw members' attention to in the report at the end of the first quarter.

6. What are the legal aspects?

6.1 The statutory requirement for a Housing Revenue Account (HRA) is set out in Part VI of the Local Government and Housing Act 1989. Section 74 of the Act sets out the duty to keep a Housing Revenue Account as a ring-fenced fund and sets out the structure within which the HRA operates. Part VI of the Act sets out the detailed statutory provisions on the operation of the HRA, including credits to the account (income) and debits to the account (expenditure). Section 76 sets out the duty to prevent a debit balance on the HRA. The authority must implement proposals that will secure that the account for each financial year will not show a debit balance. Members will also note the provisions of Schedule 4 of the Act which sets out the requirements concerning 'The Keeping of the Housing Revenue Account'.

7. Monitoring Officer's comments:

This is a financial update report for members' information. As such, the monitoring officer would like to remind members that they are under an obligation to exercise their fiduciary duties carefully. The meaning of fiduciary duty can be summarised as a duty to conduct administration in a business-like manner with reasonable care, skill and caution and with due regards to the council's rate payers. When discharging their fiduciary duties councillors will need to consider the following:

- a) Prudent use of the council's resources, including the raising of income and the control of expenditure;
- b) Financial prudence both long and short term; and
- c) Striking a fair balance between the interest of the council tax payers on the one hand and the community interest and adequate and efficient services on the other hand.

8. Report details:

HRA BUDGET MONITORING – QUARTER 1

8.1 Background to the HRA

The Housing Revenue Account (HRA) records expenditure and income relating to council dwellings and the provision of services to tenants. Housing authorities have a statutory duty to maintain a HRA account, which is primarily a landlord account, in order to account to their tenants for income and expenditure on council housing separately from other functions and services of the Council. This includes tenancy management, repairs and maintenance, council house building and council house retrofits.

8.2 Projected transfer from the working balance

	£
Approved Budgeted transfer from the working balance	2,541,730*
Supplementary budgets – Council approved 18th July 2023	300,000
Revised Budgeted transfer from the working balance	2,841,730

*2023/24 Approved Budget Represented By	£
85A1 MANAGEMENT	1,718,700
85A11 EDWARDS COURT	(110,210)
85A2 TENANCY SERVICES	1,764,880
85A3 SUNDRY LANDS MAINTENANCE	631,920
85A4 REPAIR & MAINTENANCE PROGRAMME	7,025,370
85A5 REVENUE CONTRIB TO CAPITAL	4,000,000
85A6 CAPITAL CHARGES	4,073,090
85A7 HOUSING ASSETS	2,551,980
85A8 RENTS	(21,012,110)
85B2 INTEREST	1,898,110
85B4 MOVEMENT TO/(FROM) WORKING BALANCE	(2,541,730)

The HRA has built up a working balance of £7.243 million as at 31 March 2023. This is higher than the £4 million contingency resolved to be retained. The HRA approved Medium Term Financial Plan (MTFP) plans to reduce the working balance, largely through significant revenue contributions to capital. This enables the built-up working balance to be used to fund the HRA capital programme towards planned works, retrofits and Council House building developments.

The revised budget deficit position of £2.842 million is due to a large anticipated revenue contribution of £4 million to capital.

8.3 The budget variances anticipated at Quarter 1, indicate that £2,654,730 will be taken from the working balance in 2023/24 – See appendix 2. This represents a movement of £187k compared to the revised budget £2,841,730 for 2023/24. The key budget deviations are explained below.

Budget Heading	Forecast Outturn Budget Variance at Quarter 1 (Under)/Overspend
Management	£100,000
<p>Officers Responsible: Assistant Director of Housing (AP) Assistant Director of Housing (LB)</p> <ul style="list-style-type: none"> • Tenant decant costs – The continuing decants from Rennes House requires tenants to be compensated with home loss payments and other general financial support relating to their relocation costs. Decants are dependent upon the properties requested by the tenants becoming available and, in the year to date, we have managed to support additional tenants in readiness for the full vacation of Rennes House. 	
Tenancy Services	£13,000
<p>Officer Responsible: Assistant Director of Housing (LB)</p> <ul style="list-style-type: none"> • The budget anticipated 40 Right- to-Buy property sales in 2023/24. It is now anticipated that there will likely be closer to 30 Right-to-Buy sales during the year. This will result in a reduction of £13,000 of admin fee income. 	
Sundry Land Maintenance	(£300,000)
<p>Officers Responsible: Assistant Director of Housing (AP) Assistant Director of Housing (LB)</p> <ul style="list-style-type: none"> • The budget relating to expected action required due to Ash Die Back in trees on HRA land has been re-profiled to reflect new expectations around when the disease is likely to impact in Exeter. <p>Ash die back hasn't spread as pervasively since 2020 as originally expected, nonetheless industry expectations still put total disease impact rates at 90% and we know that the disease is now endemic in Devon and Exeter so remedial works will increase until the population has been impacted to its maximum extent.</p> <p>The £300k underspend brought forward from 2022/23 is unlikely to be needed until 2027/28 to 2029/30, beyond the period of the existing MTFP. Officers will continue to monitor the situation to ensure that there is appropriate budget provision for works needed.</p>	

Total budget (underspend)/overspend	(£187,000)
2023/24 HRA Deficit/ (Surplus)	£2,654,730

8.4 Impact on HRA Working Balance

The HRA Working Balance represents amounts set aside to help facilitate service improvements, repay debt or to provide investment in the stock in future financial years.

The forecast balance, as at 31 March 2024, is set out below:

Movement	2023/24
Opening HRA Working Balance, as at 1 April 2023	£7,243,104
Forecast transfer (from)/to the working balance for 2023/24	(£2,654,730)
Balance resolved to be retained (HRA contingency)	(£4,000,000)
Forecast Balance Available, as at 31 March 2024	£588,374

The significant transfer from the working balance anticipated for 2023/24 brings the working balance as at 31 March 2024 down closer to the HRA balance resolved to be retained of £4m.

8.5 HRA Available Resources over the Medium Term

The forecast HRA available resources for delivering both housing services and capital investment are set out in Appendix 3 for the period to 2026/27.

The total available resources is made up of several reserve balances; the HRA working balance, the Useable Capital Receipts reserve and the Major Repairs Reserve.

The HRA working balance is the movement on revenue budgets, contributions can be made from this reserve towards financing capital budgets in the form of 'Revenue Contributions to Capital'. The useable capital receipts reserve is made up of both the Right-to-Buy (RTB) receipts reserve and the Non-RTB receipts reserve; these reserves are available to finance capital spend, some restrictions apply. The Major Repairs Reserve is increased each year by the HRA depreciation charge to revenue, this reserve is then available to spend on the HRA capital programme.

The total forecast HRA available resources is impacted by variances in both revenue budgets detailed in section 8.3 above and variances in capital budgets detailed in section 8.9 below.

The forecast total available resources over the Medium Term Financial Plan (MTFP) has improved by £200k since last reported at 2022/23 Outturn stage. This is largely as a result of the in-year savings as a result of the slow spread of ash die back.

Total available reserves over the MTFP are now expected to be £1.075 Million after deducting the £4 million balance resolved to be retained (HRA contingency).

8.6 HRA Debt

In October 2018 the Government formally removed the HRA debt cap, which restricted the amount of borrowing stock-holding local authorities could have for the purposes of the HRA. The lifting of the 'debt cap' means that local authorities are now able to borrow for housebuilding in accordance with the Prudential Code.

Executive on 8 October 2019 approved the first Council House Building Programme, which will deliver 100 new homes into the HRA at a cost of £18 million. On 5 April 2020, the Council took out a loan of £15.36 million from the PWLB to support this programme. The remaining £2.64 million will be funded by capital receipts.

As at 31 March 2023, the HRA's borrowing stood at £73.242 million. The total of the £15.360 million new loan and the former 'debt cap' level of £57.882 million.

The HRA currently has approval to borrow a further £3.9 million, this will likely be required in the next 12 to 24 months.

8.7 HRA Capital Programme

The 2023/24 HRA Capital Programme was approved by Council on 21 February 2023. Since that meeting the following changes have been made that have increased the 2023/24 programme.

Description	2023/24	Approval / Funding
HRA Capital Programme	£19,320,865	
Budgets carried forward from 2022/23 HRA Capital Programme	£3,068,800 £2,149,331	Executive – 4 April 2023 (Q3) Executive – 27 June 2023 (Q4)
Local Authority Housing Fund round 1	£2,890,024	Council - 13 th March 2023
Social Housing Decarbonisation Fund (year 1)	£661,300	Executive – 27 June 2023
Local Authority Housing Fund round 2	£1,447,500	Council – 8 th August 2023

Revised HRA Capital Programme	£29,567,820	
--------------------------------------	--------------------	--

8.8 Performance

The current HRA Capital Programme is detailed in Appendix 4. The appendix shows a total forecast spend of £29,567,820 compared to the £19,320,865 approved programme; an increase of £10,247k. This is made up of re-profiling of capital spend in 22/23, and grants from the Local Authority Housing Fund and Social Housing Decarbonisation Fund.

8.9 Capital Budget Variances

The details of key (greater than +/- £50k) variances from budget are set out below. The Assistant Director of Housing (AP) will be able to provide further details in respect of these areas, if required. There are no projected variances as at Quarter 1.

8.10 Schemes to be deferred to 2024/25 and beyond

There are no schemes which have been identified as being wholly or partly deferred to 2024/25 as at Quarter 1.

9. Historic Council own build Final Accounts to 31 March 2024

9.1 The Council's own build properties at Rowan House and Knights Place form part of the overall Housing Revenue Account, but separate income and expenditure budgets are maintained in order to ensure that they are self-financing.

As the 21 units were built using HCA funding in conjunction with borrowing (£998k), they are accounted for separately in order to ensure that they self-financing. A separate COB working balance and Major Repairs Reserve are maintained until such time as a sufficient balance has been accumulated to repay the debt attributable to these properties, at which point the units can be accounted for with the wider HRA stock.

9.2 Key Variances from Budget

There are no projected variances to report at the end of Quarter 1. The budgeted transfer from the COB working balance of £32,070 is still projected to be achieved during 2023/24.

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

The Housing Revenue Account contributes to a key purposes, as set out in the Corporate Plan; Building great neighbourhoods.

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

For clarity, these are specific financial risks, alongside the risks captured in the corporate risk register.

It is not permissible for the HRA to go into an overall financial deficit position, it is therefore important to ensure that an adequate level of HRA balances is maintained as a

contingency against risks. The HRA resolve to retain a working balance at no less than £4 million to mitigate against financial risks.

Areas of budgetary risk are highlighted to committee as part of the quarterly budget monitoring updates.

12. Equality Act 2010 (The Act)

12.1 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.

12.2 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.

12.3 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.

12.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because there are no significant equality and diversity impacts associated with this decision.

13. Carbon Footprint (Environmental) Implications:

We are working towards the Council's commitment to carbon neutral by 2030. The impact of each scheme is considered prior to approval.

14. Are there any other options?

None.

Director Finance, David Hodgson

Author: Claire Hodgson

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

Background papers used in compiling this report:-




None

Contact for enquires:




Democratic Services (Committees)
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A number of areas of budgetary risk have been identified within the HRA, as follows:

Budget Title	2023/24 Approved Budget	Risk Rating	Risk and mitigation
General Maintenance	£2,680,580 (revenue)		<p>The volatility of the level of requested repairs due to factors beyond the control of the Council, for example adverse weather conditions, represents a budgetary risk. The impact of property inspections undertaken by the Tenancy Services Team may also lead to the identification of additional repairs. Spend to month three is slightly ahead of profile.</p> <p>Mitigation measures include contract meetings with the Contractor which include budget review and work in progress updates. Other supporting measures include weekly Surveyors meetings to highlight repair demand pressures.</p>
Repairs to Void Properties	£1,346,000 (revenue)		<p>Property turnover and the varying condition of properties when returned to the Council represent a budgetary risk.</p> <p>There are a high number of voids compared with this point last year, and a proportion of these are being sub-contracted at a slightly higher cost, however it is anticipated that these can be offset with savings in other repairs and maintenance budgets. Mitigation includes property inspections by Housing Officers which highlight sub-standard property conditions wherever possible and are an early alert to issues.</p>
Rental Income from Dwellings	(£21,012,110) (revenue)		<p>Right to Buy sales, number of new tenancies set at convergence rent levels, number of days lost through major works, and rent lost in respect of void properties all impact on the annual rental income.</p> <p>Rental income after the first 3 months is largely in line with profile.</p>

Risk Rating:

	Potential for a favourable variance compared to the budget or no variance at all
	Potential for adverse budgetary variance of between 0% and 5% that will be kept under review
	Potential for an adverse budgetary variance of more than 5% and will be monitored closely

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HOUSING REVENUE ACCOUNTS BUDGET MONITORING 2023-24

APPENDIX 2

QUARTER 1

ACTUAL TO DATE			YEAR END FORECAST			
PROFILED BUDGET	ACTUAL TO DATE	VARIANCE TO DATE	MANAGEMENT UNIT	APPROVED BUDGET	Q1 FORECAST VARIANCE	CURRENT OUTTURN FORECAST
£	£	£		£	£	£
317,508	389,828	72,320	MANAGEMENT	1,718,700	100,000	1,818,700
(41,200)	8,224	49,424	EDWARDS COURT	(110,210)	0	(110,210)
369,730	256,992	(112,738)	TENANCY SERVICES	1,764,880	13,000	1,777,880
180,103	56,701	(123,402)	SUNDRY LAND MAINTENANCE	931,920	(300,000)	631,920
1,879,035	1,546,443	(332,592)	REPAIRS & MAINTENANCE PROGRAMME	7,025,370	0	7,025,370
0	0	0	REVENUE CONTRIBUTION TO CAPITAL	4,000,000	0	4,000,000
0	0	0	CAPITAL CHARGES	4,073,090	0	4,073,090
542,563	518,506	(24,057)	HOUSING ASSETS	2,551,980	0	2,551,980
(5,253,028)	(5,158,777)	94,251	RENTS	(21,012,110)	0	(21,012,110)
474,528	470,572	(3,956)	INTEREST	1,898,110	0	1,898,110
			MOVEMENT TO/(FROM) WORKING BALANCE	(2,841,730)	187,000	(2,654,730)
			Net Expenditure	0	0	0
			Working Balance 1 April 2023	7,243,104	31 March 2024	4,588,374

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COUNCIL OWN BUILD SITES

PROFILED BUDGET	ACTUAL TO DATE	VARIANCE TO DATE	MANAGEMENT UNIT	APPROVED BUDGET	Q1 FORECAST VARIANCE	CURRENT OUTTURN FORECAST
£	£	£		£	£	£
23,050	14,630	(8,420)	MANAGEMENT	92,200	0	92,200
(3,035)	(2,328)	707	ROWAN HOUSE	(12,140)	0	(12,140)
(18,058)	(10,815)	7,243	KNIGHTS PLACE	(72,230)	0	(72,230)
0	0	0	INTEREST	5,490	0	5,490
0	0	0	CAPITAL CHARGES	18,750	0	18,750
			MOVEMENT TO/(FROM) WORKING BALANCE	(32,070)	0	(32,070)
			Net Expenditure	0	0	0
			Working Balance 1 April 2023	312,318	31 March 2024	280,248

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APPENDIX 3

HRA AVAILABLE RESOURCES

HOUSING REVENUE ACCOUNT	2023-24 £	2024-25 £	2025-26 £	2026-27 £	TOTAL £
CAPITAL RESOURCES AVAILABLE					
Usable Receipts Brought Forward					9,782,583
Major Repairs Reserve Brought Forward					18,063,137
Other HRA Sales	163,000	150,000	200,000	150,000	663,000
RTB sales	875,000	875,000	875,000	875,000	3,500,000
Surrender back to DLUHC - pending investment in replacement affordable housing	424,444			-1,180,338	(755,894)
Major Repairs Reserve	4,073,090	3,998,090	3,948,090	3,948,090	15,967,360
Revenue Contributions to Capital	4,000,000	2,500,000	3,350,000	3,550,000	13,400,000
Local Authority Housing Fund grant	2,022,118	-	-		2,022,118
Local Authority Housing Fund s106	2,345,406				2,345,406
Social Housing Decarbonisation Fund	661,300	833,102			1,494,402
Commuted sums	0				0
Borrowing	2,400,000	1,500,000			3,900,000
Total Resources available	16,964,358	9,856,192	8,373,090	7,342,752	70,382,112
CAPITAL PROGRAMME					
HRA Capital Programme	29,567,820	17,687,112	11,155,711	11,517,358	69,928,001
Q1 - Slippage / Re-profiling	0	0	0	0	0
Q1 - Overspends / (Savings)	0				0
Total Housing Revenue Account	29,567,820	17,687,112	11,155,711	11,517,358	69,928,001
UNCOMMITTED CAPITAL RESOURCES:					
Usable Receipts Brought Forward	9,782,583	6,575,109	2,615,851	1,690,851	9,782,583
Major Repairs Reserve Brought Forward	18,063,137	8,667,149	4,795,487	2,937,866	18,063,137
Resources in Year	16,964,358	9,856,192	8,373,090	7,342,752	42,536,392
Less Estimated Spend	(29,567,820)	(17,687,112)	(11,155,711)	(11,517,358)	(69,928,001)
Uncommitted Capital Resources	15,242,258	7,411,338	4,628,717	454,111	454,111
WORKING BALANCE RESOURCES:					
Balance Brought Forward	7,243,104	4,588,374	4,771,689	4,602,885	7,243,104
HRA Balance Transfer - to/(from) Working Balance	(2,841,730)	183,315	(168,804)	18,311	(2,808,908)
Q1 forecast under/(over)spend 2023-24	187,000				187,000
Balance Carried Forward	4,588,374	4,771,689	4,602,885	4,621,196	4,621,196
Balance Resolved to be Retained	(4,000,000)	(4,000,000)	(4,000,000)	(4,000,000)	(4,000,000)
Uncommitted HRA Working Balance (after balance resolved to be retained of £4m)	588,374	771,689	602,885	621,196	621,196
TOTAL AVAILABLE CAPITAL RESOURCES (after balance resolved to be retained of £4m)	15,830,632	8,183,027	5,231,602	1,075,307	1,075,307

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**2023-24
CAPITAL MONITORING - QUARTER 1**

	2023-24 Capital Programme	2023-24 Spend	2023-24 Forecast Spend	2023-24 Budget to be Carried Forward to Future Years	TO 2024-25	TO 2025-26	TO 2026-27	2023-24 Programme Variances Under ()
	£	£	£	£	£	£	£	£
HRA CAPITAL								
<i>EVERYONE HAS A HOME</i>								
Adaptations	957,242	139,250	957,242					-
Balcony Walkway Improvements	447,233	0	447,233					-
Bathroom Replacements (inc. Communal)	1,241,808	335,889	1,241,808					-
Boiler Replacement Programme & Central Heating	864,823	79,299	864,823					-
Common Area Footpath & Wall Improvements	244,290	7,018	244,290					-
Communal Area Improvements - New Flooring	50,000	16,494	50,000					-
Communal Door and Screen Replacements	134,900	64,076	134,900					-
Door Replacements (inc. Outbuildings)	404,655	10,147	404,655					-
Electrical Central Heating	22,554	0	22,554					-
Electrical Rewires - Communal	155,733	4,380	155,733					-
Electrical Rewires - Domestic	836,814	91,417	836,814					-
Energy Conservation	2,307,778	288,038	2,307,778					-
Estate Improvements	100,000	1,753	100,000					-
Fire Risk Assessment Works - Compliance	947,916	38,098	947,916					-
Fire Risk Assessment Works - Planned	333,340	21,523	333,340					-
Fire Safety Storage Facilities	189,462	9,177	189,462					-
Kitchen Replacements (inc. Communal)	1,225,759	222,171	1,225,759					-
LAINGS Refurbishments	0	32,145	0					-
Lift Upgrades	234,800	0	234,800					-
Reroofing - Flats	550,000	53,086	550,000					-
Reroofing - Houses (outbuildings, chimney, gutters, downpipes, fascia)	1,192,386	35,642	1,192,386					-
Porch Canopies	52,558	4,489	52,558					-
Rennes House	250,000	0	250,000					-
Soil Vent Pipe Replacement	24,000	0	24,000					-
Structural Repairs	573,412	46,496	573,412					-
Window Replacements	1,241,607	141,133	1,241,607					-
Plastering	75,000	0	75,000					-
HOUSING REVENUE ACCOUNT TOTAL	14,658,070	1,641,722	14,658,070	0	0	0	0	0
COUNCIL OWN BUILD CAPITAL								
Social Housing Acquisitions - Section 106	589,507	0	589,507					-
Social Housing Acquisitions - Open Market	503,649	382,272	503,649					-
St Loyes Extracare Scheme	191,544	-44,382	191,544					-
Local Authority Housing Fund	4,367,524	1,871,959	4,367,524					-
Council House Building Programme - Bovemoors Lane	9,709	0	9,709					-
Council House Building Programme - Hamlin Gardens	3,548,909	725,290	3,548,909					-
Council House Building Programme - Vaughan Road	5,660,906	1,261,944	5,660,906					-
DP budget	0	0	0					-
Council Own Build (Phase 3)	38,002	47,267	38,002					-
COUNCIL OWN BUILD TOTAL	14,909,750	4,244,350	14,909,750	0	0	0	0	0
OVERALL HOUSING REVENUE ACCOUNT TOTAL	29,567,820	5,886,072	29,567,820	0	0	0	0	0

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REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

REPORT TO COUNCIL

Date of Meeting: 17 October 2023

Report of: Chief Executive

Title: Net Zero Exeter update

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 The purpose of this report is to provide Members with a summary of the work that has been delivered by Exeter City Futures (ECF) to deliver a Net Zero Exeter. It reviews the work of ECF to date, formally acknowledges the closure of ECF and sets out some options for how the work can be managed going forward, given Member's commitment.

1.2 A Review Report prepared by the former Chief Executive and Growth Director, at the end of his secondment to ECF, can be found in Appendix A. The report provides helpful insight into the scale of ambition adopted by ECF and the success it has had in fostering a culture of collaboration and innovation. The report also provides a reflection of the challenges ahead for local authorities and the barriers to achieving a Net Zero Exeter by 2030.

2. Recommendations:

2.1 Members note the content of the report contained in Appendix A and in particular the reflection that a step change in the Government's approach to delivering Net Zero is required to give any prospect for the city of Exeter to achieve a Net Zero Exeter 2030.

2.2 Members note the closure of ECF and note the work that has been done through ECF to build collaboration and deliver progress against the city's Net Zero ambitions.

2.3 That the Chief Executive, in consultation with the Portfolio Holder for Climate and Ecological crisis, develops proposals for how Members might work with partners locally to ensure oversight of the city's delivery on this key strategic goal.

2.4 That Members note that officers will identify how external work on this priority will be resourced given the end of the secondments to ECF.

3. Reasons for the recommendation:

3.1 To note the report produced by the former Chief Executive and Growth Director at the end of his secondment to ECF and to formally acknowledge the closure of Exeter City Futures Community Interest Company, recognising work that has been achieved to date and to consider how the city's Net Zero ambitions will continue to be delivered.

3.2 To recognise that the Council has significant work to do as we work towards achieving Net Zero by 2030 in our operations. In addition, as part of the Council's role in place leadership, it is appropriate that the Members consider how the council retains oversight on work being done across the city to achieve Net Zero including continuing to work with partners on opportunities for collaboration.

4. What are the resource implications including non financial resources

4.1 The two secondments to Exeter City Futures (Chief Executive & Growth Director and the Director for City Transformation) ended in December 2022. It is appropriate to consider how the Council can continue to resource its support to the wider Net Zero ambitions for the city.

4.2 The Council is continuing to face financial pressures that are more challenging because of inflation, higher energy costs and increased borrowing. The identified shortfall in the Medium Term Financial Plan will require a greater level of focus on the Council's core responsibilities and on outcomes which it can directly influence to achieve our Net Zero ambitions.

4.3 In terms of achieving Net Zero, the Council can directly influence a reduction in its own carbon emissions through schemes such as retrofitting its property assets and plans are in place to continue with this work. One off funding has been provided to deliver this work over a four year period and a team has been established.

4.4 The Council also has an important place leadership role. Delivering a 'Net Zero Carbon City' is a strategic priority for the Council but it not possible to deliver this alone. Members will need to explore options for how this important work is delivered in the future and how the Council leads city oversight of this agenda.

5. Section 151 Officer comments:

5.1 There is no specific budget to support resourcing external work, although Members have ring-fenced £1 million in an earmarked reserve to support Net Zero. As set out in 8.3, some of this funding has already been allocated. Therefore it is likely that any proposals brought forward will require a shift in resources from other parts of the budget in order to finance them

6. What are the legal aspects?

6.1 Section 1 of the Climate Change Act 2008 states that '[i]t is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline. The target was originally 80% and was increased to 100% by the Climate Change Act 2008 (2050 Target Amendment) Order 2019.

6.2 Exeter City Council has declared a climate emergency and set the target of achieving net zero by 2030.

7. Monitoring Officer's comments:

7.1 Members are referred to section 6 of the report where the legal implications are highlighted.

8. Report details:

History

8.1 Executive endorsed ECF as a vehicle for better understanding and addressing the transportation, energy and health challenges facing the city. In February 2016, Executive supported the Council becoming a member of the ECF Community Interest Company and allocated £50,000 as a working budget to support the start-up of the ECF programme.

8.2 ECF worked with institutions and communities, including the Council, to develop the Net Zero Exeter 2030 Plan and this has been adopted by leaders across the city.

8.3 In July 2021, Executive agreed to the development of a new Net Zero team focussed on reducing the carbon emissions generated directly by the Council which would in turn also contribute to the city-wide Net Zero agenda. An allocation of a one-off £1 million budget was established to support this work. This was funded from the General Fund. Part of the £1m budget was used to fund two new temporary posts and provide a revenue budget for four years to deliver activity. The work of the Council's Net Zero team will be reported to Strategic Scrutiny Committee in September 2023.

8.4 In November 2021, Executive agreed to deploy senior capacity, via secondment, to the leadership of the Net Zero Exeter 2030 Plan with the former Chief Executive & Growth Director leading Exeter City Futures CIC for two days a week and the Director for Transformation working up to three days a week. It was agreed that this would be for a 12 month period.

8.5 In January 2022, a report was presented to Executive setting out the strategic case for an Exeter Development Fund. The proposal was to establish a fund that combines public and private sector finance to transform the built environment. The fund would harness capital flows within the city and enable investment in infrastructure development in a way that deliver place making aspirations without long term dependence on bids for Government grants. An update on the latest position with the Development Fund can be found in Appendix B and a full business case is planned to be brought to Members at the end of the year.

8.6 At the end of the December 2022, the secondment of the former Chief Executive and Growth Director and Director for Transformation ended with no identification of how this externally-focussed work would be taken forward. Council officers do continue to participate in external partnerships such as the Devon Climate Emergency Response Group.

8.7 In June 2023, it was announced that ECF would close and that the goals would be delivered through the strategies of Exeter City Council, Devon County Council, the

Report by the former Chief Executive and Growth Director

8.8 The report contained in Appendix A was prepared by the former Chief Executive and Growth Director following the end of his secondment to ECF. The report summarises the work that has been achieved by ECF to build collaboration between the public sector institutions and sets out the immediate challenges arising from the Net Zero mission.

8.9 The report reflects on Members facing financial pressures that are more challenging because of inflation, higher energy costs and increased rates for borrowing. It notes that the identified shortfall in the Medium Term Financial Plan will therefore require a greater level of focus on the Council's own immediate responsibilities.

8.10 The Council does not have the powers, legal or policy to effect the necessary changes required across the city. Without private and government investment, it is difficult for the Council to prioritise this work above its core responsibilities and outcomes it can directly influence, such as reducing its own carbon emissions.

8.11 The report suggests that the Council should take forward four legacy projects led by the former Chief Executive and Growth Director whilst on secondment to ECF. An update on the latest position with these projects is summarised below. Members should note that most of these projects are no longer being delivered by the Council.

Project	Aim	Update
Creating a vision for a low vehicle city centre	Engage the public and key stakeholders in the design of a blueprint for the City-Centre as a tool for use by stakeholders in their individual and collective development plans.	Work is being progressed by DCC through the Exeter Local Cycling & Walking Infrastructure Plan (LCWIP) https://democracy.devon.gov.uk/mqAi.aspx?ID=34988
Community Energy Pilot	To bring forward a business case setting put proposals to test out models that could scale up domestic retrofit using community development approaches.	An outline business case has been produced but the work has not progressed due to a lack of staff resources to undertake the work.
Co-ordination of the delivery of the Innovate UK funded Pioneering Places project	The Phase 1 bid provides funding to create a blue print for collaboration across sectors to enable more agile and flexibility joint working on major projects. Successful completion of the project (June 2023) has the potential to open the gateway for Phase 2 funding @£8 million which could be used on a real life project e.g. delivery of a Commercial DHN.	The funding for this scheme was not drawn down due to a lack of capacity to undertake the work required.
Facilitating the collaboration necessary for the delivery of a city centre commercial District Heating Network	Develop the collaboration that resulted in public sector support for a large funding bid to BEIS in Nov 2022. Should the bid be successful (announcement due Feb 23) this work will need to continue to bring together a single business case across the key public sector partners.	Discussions are progressing with regard to energy centre location and network routing. Ongoing discussions with key offtaker partners.

Options for future delivery of city-wide agenda

8.12 Although the Council is continuing to invest in reducing its own carbon emissions and there is a Director responsible for this, at the point that the secondments to ECF ended- December 2022, no capacity was identified to lead on the city-wide Net Zero agenda. If Members wish to continue to explore delivery of the city-wide Net Zero agenda, consideration needs to be given as to how this can be balanced against the financial and resourcing pressures that have been outlined in this report and in Appendix A.

8.13 Given the council's place leadership role, Members may wish to consider how best to lead oversight of the work taking place locally. This would involve representatives from the Council continuing to work with existing Strategic Groups such as the Exeter Place Board, the Devon Climate Emergency Group and the Civic University Agreement but also developing a coordinating body to oversee delivery of the city-wide ambitions. Without

this, there is a risk that there will be no clear ownership of the agenda, work could become disjointed and duplication could occur.

8.14 The Civic University Agreement (CUA) was established in October 2021 and was signed by leaders from the University of Exeter, the Council, Exeter College and the Royal Devon University Healthcare NHS Foundation Trust. As part of the agreement, the partnership established a mission to 'Deliver a Net Zero Exeter'.

8.15 A recent review of the CUA, provided the following update in relation to the mission to deliver a Net Zero Exeter:

Exeter City Futures (ECF) has now wound down and discussions have taken place between ECF and the University regarding the legacy of activities and projects. A plan is being developed in terms of new leadership and priorities, to support this work going forwards. The University has established a core group of lead environment academics to establish the overall brand and underpinning solutions for the Green Futures Solutions (GFS) which has been approved by the University's Executive Board on a commercial basis. Significant University investment for GFS has been matched by a philanthropic gift. We are currently looking for suitable premises for the GFS Hub and an ask has been submitted to government with partners in the LEP and wider region.

8.16 The review suggests that that the CUA should keep the carbon focus but remove the Net Zero headline – instead referencing the importance of the transition to a low-carbon economy. The review goes on to suggest that it would benefit the city to have one united strong voice to help deliver what will be a challenging transformation.

8.17 Regardless of which approach is preferred, Members will be aware that the Council cannot take sole responsibility for delivering a Net Zero Exeter by 2030 as it has neither the resources nor the levers. The Council can help to provide place leadership and create an environment in which all partners are held accountable for making progress with their remit.

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

9.1 This decision will contribute the Council's strategic priority of a Net Zero Carbon City.

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

10.1 Without Government and private investment, there is a significant risk that a Net Zero Exeter will not be achieved by 2030. This is compounded by the Government's national Net Zero commitment of 2050. Working in partnership towards delivery of the Net Zero Exeter 2030 plan will help to reduce this risk.

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 relation to this report, no potential impact has been identified on people with protected characteristics as determined by the Act because the proposals do not reduce or change services to the extent that they will impact on any individuals including those with protected characteristics.

12. Carbon Footprint (Environmental) Implications:

12.1 The delivery of the Council's ambition to reduce energy use and carbon emissions will have a positive impact on the carbon footprint for both the Council and the city.

13. Are there any other options?

Options have been outlined in section 8 of this report.

Chief Executive, Bindu Arjoon

Author: Chief Executive, Bindu Arjoon

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

Background papers used in compiling this report:-

None

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REPORT TO EXECUTIVE

Date of Meeting: 28th February 2023

Title: Net Zero Exeter

Is this a Key Decision?

No

Is this an Executive or Council Function?

Executive

- **What is the report about?**

1.1 A progress report by the CE&GD on the work over the last 12 months with Exeter City Futures (ECF) supporting a Net Zero Exeter. It highlights the considerable progress that has been made to create an environment of collaboration across the city and to align the public sector institutions on a single vision that has informed their organisational ambitions.

1.2 It reflects on the reality of the challenge facing the city to achieve a Net Zero 2030 goal and the work that is taking place that could potentially accelerate progress. It reviews the work of Exeter City Futures to date, the limitations on resources and the scale of the challenge facing both the institutions of the city as well as the practical legislative and technical constraints that present very real barriers to achieving a Net Zero city. It invites the elected Members to consider in the context of the City Council's financial challenges how realistically it is for the city council to take leadership for a city wide agenda. Very specifically it invites the elected Members to reflect on where the expected level of investment will be found to translate worthy aims to practical implementation, and sets out a clear statement of what Members may wish to settle on as the City Council's defining measure of success without abandoning the declaration of a climate emergency and a Net Zero Exeter 2030.

- **Recommendations:**

1. That Members confirm the City Council's position in relation to a Net Zero Exeter 2030 goal is to be a supportive council that fosters innovation within the city of Exeter in pursuit of a Net Zero Exeter 2030 and a willingness to pilot initiatives in a collaborative fashion with the city's institutions.
2. That Members acknowledge the work that has been done through Exeter City Futures to build collaboration between the public sector institutions and

to encourage progress on meeting the immediate challenges and opportunities arising from the Net Zero mission.

3. That Members note the proposed legacy projects as set out in Section 7.44.
4. That Members acknowledge that a step change in the Government's approach to delivering Net Zero is required to give any prospect for the city of Exeter to achieve a Net Zero Exeter 2030. The pace at which the city's institutions have to move to make the scale of changes required to achieve a Net Zero 2030 Exeter requires a no regrets approach to getting on with the task, a spirit of innovation.
5. That Members note a number of steps will need to be taken to satisfy itself regarding the market testing of heat network solutions ahead of any decision to enter into a contract with a heat provider.

- **Reasons for the recommendation:**

3.1 Now that the two secondments to Exeter City Futures (Chief Executive & Growth Director and the Director for City Transformation) have come to an end, it is appropriate to reflect on the work to support the Net Zero Exeter 2030 Plan. Members are facing immediate financial pressures that are demonstrably more challenging because of inflation, higher energy costs and increased rates for borrowing, the identified shortfall in the Medium Term Financial Plan will therefore require a greater level of focus on the council's own immediate responsibilities. It is reasonable therefore to assume the Council's focus will necessarily shift to a focus on the Council's own greenhouse gas emissions with a reduced level of support for city wide work.

3.2 Members therefore will need to consider whether the commitment to a Net Zero council and supporting a Net Zero city by 2030 is to change. Members may wish to focus on providing a supportive local authority role that is creative in addressing the challenges, rather than leading the work at city scale. An example of this in action could be the delivery of a district heat network. Heat networks are identified in the greenhouse gas emissions inventory and are expected to be part of the mix in providing heat to homes and buildings. The Council has developed through the work of ECF a shared understanding of the challenge and this is evident in the support all of our organisations have given to promoting a district heat network solution. Playing a supportive role can continue even if ECC is no longer driving the leadership of the programme. A creative organisation that promotes collaborative solutions against the Net Zero goal is an important and worthy goal, even if that falls short of taking direct responsibility for delivery of the city wide Net Zero plan, stating the position would be beneficial.

3.3 A significant gap in leading a Net Zero programme is access to private finance and capacity to deliver programmes and projects. An under resourced local government county and city will struggle to prioritise the work above statutory services. This resource constraint is a national issue for local government and the sector wishing to provide support for the Net Zero mission.

3.4 An ambitious city and a creative bureaucracy to address the challenges however would make for essential partners to this long term work. Under the heading “Leading Net Zero Exeter”, the following commentary was provided in the Net Zero Exeter 2030 Plan:

“As we embark on this journey, it’s important to recognise that a commitment to make a whole City carbon-neutral is beyond the authority of Exeter City Council alone. We will require strong collaboration and collective action from everyone across the city; individuals, businesses, community organisations and the local authority.

Our net-zero vision for the city is aspirational, but will be tempered by the funding we have to work with (whether revenue or capital) and the level of engagement that we can achieve.

Our public sector faces extremely hard times; with a rapidly growing population, increasing demand for services (including social care, transport and education), and previous and ongoing reductions in government funding. To achieve our net-zero carbon ambitions we must seek new ways of doing things and seek out new approaches to delivering services and accessing investment. We must work much more closely together, across the public, business and community sectors, sharing responsibility for finding joint solutions for the challenges we are all facing and seeking wherever possible to collaborate and join up our services locally. The role of Exeter City Futures CIC is to help the city collectively respond to the climate crisis and achieve a net-zero carbon Exeter.”

5.5 In clarifying the role of the City Council in supporting an innovation agenda and helping create the conditions for institutional co-ordination and collaboration in pursuit of a Net Zero city Members are distinguishing between piloting projects and scaling up activity to meet a Net Zero linear trajectory of greenhouse gas emissions for the city of Exeter. This acknowledges the practical limitations of the city of Exeter responding to an agenda that requires critical Government and/or private sector investment to achieve delivery.

- **What are the resource implications including non-financial resources.**

4.1 At the heart of this report is the challenge facing local government in general and Exeter City Council in particular in wishing to deliver a Net Zero city. The City Council is not resourced to deliver a Net Zero city, it does not have the powers, legal or policy to effect the necessary change, it therefore needs the co-operation of everyone, from private individuals to institutions and business, the voluntary sector and government departments. The Council has convening powers but has limited funding to lead a structured programme of implementation work. The Council is pursuing actions designed to address its own greenhouse gas emissions, such as retrofit of the council’s housing stock, retrofitting the leisure facilities and corporate

properties but has limited additional resources to support place based initiatives where the Council's powers are more about influence and encouragement rather than direct responsibility. .

4.2 Resourcing implications for any new initiatives identified in this report such as supporting a localised heat network will have to be addressed separately as part of any contract. The principal issue raised in this report is the capacity and resources to support the wider city wide work being captured by Exeter City Futures for which ECF has no capacity to progress and which is captured succinctly in the quote in para 3.4.

4.3 Access to funding has been raised as a consistent theme by ECF and was partly the reason for pressing the case for consideration of a city development fund.

“One of the most critical aspects to consider in our growing city is how to finance development and how to finance it in a way that ensures it delivers against our ambition of a carbon-neutral city and ensures Exeter remains a great place to live. A key goal is for Exeter to have ‘Locally Controlled Finance’; striving to have the capability to invest in energy-positive, car-free developments as well as schemes that benefit our local businesses and communities.” [Net Zero Plan – capability p50]

4.4 The Green agenda costs, it requires investment up front to ensure the transition is successful and therefore there is likely to be a significant gap between what the market can be obliged to do and what the city would want to achieve to deliver a Net Zero city. In the three years since the production of the Net Zero plan the challenge has not changed, the message from ECF has been the same, no one else will solve our problems, it needs a local and collective effort to make progress supported by determined leadership and with a significant amount of private and government investment.

Section 151 Officer comments:

- **What are the legal aspects?**
- **Monitoring Officer's comments:**
- **Report details:**

Background: Mission Zero

- 1.1 A good starting point to reflect on the Exeter 2030 Net Zero Goal and the role and limitation of local authorities in delivering on Net Zero ambition is the recently completed Independent Review of Net Zero, entitled Mission Zero, undertaken by Rt Hon Chris Skidmore MP.
- 1.2 In relation to catalysing local action: The Review is clear that “there must be more place-based, locally led action on Net Zero. Our local areas and communities want to act on Net Zero, but too often government gets in the way. The Government must provide central leadership on Net Zero, but it must also empower people and places to deliver. Place-based action on Net Zero will not only lead to more local support but will deliver better economic outcomes as well.”
- 1.3 The Review says local authorities are a key partner in delivering Net Zero, but current central government funding arrangements are standing in the way of effective local action. The Review recommends “wholesale simplification of local Net Zero funding, including consolidation of different pots and a reduction in competitive bidding. These changes will save both central and local government time and money, as well as do more to encourage a systems-wide approach to delivering Net Zero • Providing full backing to a set of 'trailblazer' places that want to go further and faster on Net Zero, with the aim of reaching Net Zero by 2030.” [P.12]
- 1.4 On the challenge of translating bold ambition into action the review comments: “The Government’s Net Zero Strategy sets out the UK’s decarbonisation pathway out to 2037, based on modelling on the most cost-effective Net Zero energy system in 2050. New analysis conducted over the course of the Review shows that this is still the right pathway and the policies outlined in the Strategy should go ahead. Delay is a significant risk. Our engagement and own analysis have shown that the benefits of decarbonisation are larger if it is done sooner.[p.7]
- 1.5 The review concluded “we need a new approach to our Net Zero Strategy. One which identifies stable ten-year missions that can be established across sectors, providing the vision and security for stakeholders and investors. This ‘Mission Zero’ approach should set out long term missions across ten years, between 2025 to 2035, with clear mandates or missions to be achieved in this timescale. These Missions must include the infrastructure and governance requirements needed to achieve them.”
- 1.6 In its concluding notes the review states: “There is an active, strategic choice to be made. Does the UK wish to compete in the Net Zero race, with the chance to lead, or do we wish to simply observe from the sidelines? On the one hand, to lead, and to seek first mover advantage, brings with it the opportunity to attract inward investment, to generate new supply chains and lower the costs of wider deployment of clean technologies and industries. On the other hand, to follow, risks witnessing the opportunities for jobs, infrastructure and investments that could have been on shored in the UK go elsewhere in the world. We have reached a tipping point. The risks of ‘not zero’ are now greater than the associated risks of taking decisive action on Net Zero now. The Review has outlined what is needed to effectively ‘deliver’ Net Zero investments: what must be achieved to deliver the certainty, clarity, and consistency needed from government policy and investment to de-risk the costs of private investment and capital expenditure.”

- 1.7 The Mission Zero Review calls for Government to recognise the essence of acting sooner rather than later and for a series of no regrets and no excuse policy recommendations that can be delivered now, as soon as possible.
- 1.8 In this most helpful review of the Net Zero Mission whilst recognising the Net Zero 2050 date is still appropriate it highlights the need to act sooner rather than later and helpfully establishes the need for a new relationship between central government and local government to enable effective local delivery.
- 1.9 Recently the Devon Carbon Plan committed to a county Net Zero goal of 2050. There are good reasons for local government to adopt the national 2050 commitment for Net Zero for their localities. The national target is embodied in legislation and it provides the legal and policy framework for transitioning to Net Zero. There are significant barriers to delivery and in the absence of guaranteed long term planning and finance from government local areas rightfully may caution committing to a goal that is not within their powers to achieve. In itself 2050 - as the date to achieve Net Zero - genuinely addressing all emissions, including scope 3 emissions, is immensely challenging.
- 1.10 National Audit Office (NAO) has said: “[T]here are serious weaknesses in central government’s approach to working with local authorities on decarbonisation, stemming from a lack of clarity over local authorities’ overall roles, piecemeal funding, and diffuse accountabilities.” This lack of clarity is creating blocks in the system for those local authorities that want to be proactive in delivering Net Zero.[Mission Zero P191]
- 1.11 The downside of sticking with a 2050 date is that it can be used to avoid taking difficult decisions today, and it is by definition not ambitious in a national context, and neither would it be exceptional in a global context. There has been calls for the county and the region to be a trail blazer when it comes to the Green agenda and Net Zero. Indeed, on a number of occasions Devon and the wider region have had conversations on devolution and county deals that have incorporated the Net Zero agenda as part of the proposition. Strengthening the link between devolution deals with the Net Zero agenda, and identifying a trailblazer Net Zero city is highlighted in the Mission Zero review. However, it is reasonable to suggest a Net Zero 2050 goal is a statement of ambition and it is certainly not helpful in building a case for the city to be a trailblazer for Net Zero.
- 1.12 Exeter has to be exceptional in the area of addressing climate change and reducing greenhouse emissions to deliver on the Exeter 2040 Vision Statement:
“Exeter will be a carbon neutral city by 2030 and recognised as a leading sustainable city and a global leader in addressing the social, economic and environmental challenges of climate change and urbanisation. The Exeter of the future will have grasped the opportunities ahead of us today.”
- 1.13 It is significant that the University of Exeter is committed to the 2030 Net Zero goal and other institutions are striving to be among the leaders in their field on the green agenda. The Met Office is a good example of a city institution with a clear commitment to achieve a Net Zero 2030 goal and every member of staff

has a carbon budget and they are working with their international partners to address their wider carbon footprint.

- 1.14 When the CE &GD agreed to take on a secondment role it was explicitly stated that it would be unreasonable to assume he could achieve Net Zero targets for the city of Exeter in a traditional audited approach. With little resources and funding, and in the absence of necessary policy levers over key sectors, such an approach to measuring performance is inappropriate. This does not mean performance management is not important, it clearly is, but targets can be set that are credible and targets can be set that are clearly stretching. The climate emergency declarations pronounced by most local authorities were accompanied by different target dates. Any contribution to reduction of carbon emissions are to be welcomed but a good starting position would reasonably be that national commitments embodied in legislation ought to be the starting point for measuring performance. National legislation will address the policy framework for all businesses and institutions and will ensure investors have a clear long term plan for investment decisions. Therefore it reasonable to assume any plan that accelerates performance ahead of the 2050 goal is therefore ambitious by definition and should prompt decision makers to ponder on the cost and the type of issues such an accelerated programme raises that will have to be owned by the decision makers, put in a different way what is the additional cost and what are the risks that have to be accepted to accelerate delivery ahead of the national government goal?
- 1.15 For any organisation there are risks in pursuing a goal ahead of the government target date, for example investors in different types of technology are anticipating national policy decisions but we have many examples where standards get revised and technology is backed or abandoned by government. Individual businesses therefore are faced with investing in measures that may prove to be less than optimum investments, simply because they went early rather than waiting. It is not uncommon for companies to invest in what is believed to be an emerging market, such as EV vehicles, heat pumps, modular housing etc but the timing is not right. Although we would like to think early investment is the obvious thing to do for business it can be a costly mistake, competitors who do not make the early investments but then benefit from government grant or subsidies, such as the current incentive on heats pumps may have given their competitors an advantage. There are a range of issues that are practical consideration for company boards and other organisation. The City Council is no different, Exeter City Council's decision to become the leading authority in the country for delivery of *passivhaus* buildings incurred a cost premium and a lot of learning. The private sector with an efficiency model in the main has resisted this type of approach. Therefore it is relevant to ask the question why is the city council and the other organisations in the city that are signed up to the Exeter 2040 Vision committed to the 2030 Net Zero goal and why it is important not to confuse an ambitious and stretching goal with a traditional approach that assumes one can measure success in a simple pass or fail for a Net Zero 2030 goal?

1.16 The story of Exeter City Futures CIC is rooted in the desire to support innovation and collaboration to realise a liveable city that addresses many of the stubborn challenges facing urban areas and in the process addressing the sources of greenhouse gas emissions. It comes from a good place, a desire to support public and private sector institutions in a place based approach. It is an initiative to embrace innovation, to get organisations working together and to disrupt when appropriate business as usual to explore alternative approaches to problem solving. When such an approach is aligned to a Net Zero goal it suggests an ambitious and stretching target date is good for creating a climate for innovation and entrepreneurial activity in the areas of solving problems. Creating collaboration to solve a pressing challenge is therefore a desirable and positive outcome in of itself, as this is an enabling condition for a creative an ambitious city.

1.17 It therefore follows that I do not believe the city of Exeter should move the target date of Net Zero 2030, rather we should intensify our efforts, but it does point to part of the prevailing conditions that must be addressed and an honesty among all the elected Members regarding the scale and immediacy of the challenge and therefore what does success look like? If creating innovation and demonstrating a willingness to collaborate across the city for a common purpose is success then the city of Exeter is well on its way to showcasing a successful programme that is most powerfully showcased by the declarations of the University of Exeter's ten year strategy and focus on the Net Zero and innovation agenda.

Innovation, scaling up & capacity constraints

1.18 Pioneering and innovating solutions is not the same as scaling up. ECC has pioneered *passivhaus* construction, the University of Exeter has now adopted *passivhaus* standard for all its buildings (Even the Scottish Government has now adopted this standard for its buildings), but in England national policy does not require the construction sector to adhere to Net Zero standards (or *passivhaus*). It is therefore necessary for the decision makers to acknowledge that there are barriers to delivery of a goal and there are many such barriers across all sectors contributing to greenhouse gas emissions. Moving from innovation to scale is a classic problem for entrepreneurs. It is often described as bridging the valley of death. Entrepreneurs know how difficult it can be to scale up activity, scaling up requires finance, project management resources, legal and technical alignment and a whole raft of supply chain challenges, from skills and labour to logistics and manufacturing. It is one thing to say innovation has proven the case for heat pumps, rolling out to 50,000 homes in under 8 years is a different challenge.

1.19 The great value of ECF is as a vehicle that brings together a visible leadership of key public sector partners working in a collaborative fashion to address city wide challenges with a clear focus on the major challenge of our lifetime, namely, reducing greenhouse gas emissions. Importantly it is a private/public sector partnership with a body of work behind it. Outside of Exeter it appears positive and an unusual development in the space of place based

leadership. It is seen as innovative and worthy of emulation. In Exeter it has brand recognition and, for some people, an exciting initiative that is suggestive of both opportunity and endeavour. Positive qualities that should be valued. No single body speaks for the city of Exeter and therefore as a vehicle for bringing senior leaders of key institutions together it can speak with more clout and more promise of placed based co-ordination than would be the case if it did not exist.

1.20 However, unlike the perception, the company has very limited resources, other than a small team of three staff funded by the National Community Lottery to deliver a time limited specific programme called Change Makers there is no longer employed staff. In previous years partner organisations provided a resource to the team, and this ebbed and flowed, but in the main the heavy load fell to Oxygen House/Global City Futures and Exeter City Council.

1.21 The hands on involvement of Oxygen House was important in the early formative days of Exeter City Futures and brought an air of excitement and promise that attracted private sector businesses to want to be engaged with the initiative, and indeed, attracted colleagues from the leadership of the public sector partners. A distinctive private sector approach, combined with the promise of data and technology to offer different approaches to tackling our stubborn challenges was, and still is, exciting. However, much of the technical prowess and resource capacity required to drive progress at pace and scale did not transpire. For the sake of clarity it is not that resources were not provided, it is simply that the tasks required a significantly greater scale of investment.

1.22 Charles Landry author of 9 books exploring urgent urban issues, in his book *The Creative Bureaucracy & Its Radical Common Sense* shares his experience of how cities across Europe are shaping innovation systems. Cities can be laboratories for experimentation but it is not easy, in his observation municipal authorities can be one of the biggest obstacle to change because of their silo working and the difficulties in achieving real collaboration. The strength of Exeter's culture of collaboration should not be undervalued or taken for granted, it is not found everywhere.

1.23 Public sector culture can sit uneasily with working with private sector companies in a fashion that is required to support whole city and whole system change. Typically we don't always know what the solution is before the public engage the private sector. A shared journey often develops the solution in a collaborative fashion. By the time the solution emerges people can cry foul on procurement. It is frustrating and threatens a loss of confidence with investors and private sector companies. Local Authorities simply do not have the capacity to work on a raft of problems/challenges that require solutions that they can be put out to the market as projects. Indeed, they also do not have the capital to underwrite an investment programme of the scale required to support a city achieve such an ambitious goal.

- 1.24 A lack of capacity and skills were some of the reasons for setting up a special vehicle like Exeter City Futures in the first place, local authorities like Exeter and Devon could not deliver sufficiently at scale and at pace; the problem with public funding has got worse not better. Public sector finances is reducing and it is inevitable that different models for financing city infrastructure would be required. The tension between a lack of resource and therefore entering into a partnership with the private sector to secure resources can be perceived as losing control, and in some sense tainted; interestingly this negative opinion is rarely ascribed to property joint ventures even though it is the same outcome - some degree of control is given up in order to secure funding to deliver the outputs/impact that matters to Members.
- 1.25 Having worked in the city of Exeter on delivery for over a decade the difference between strategy and implementation is stark. In the absence of public funding it is necessary to work with business and private funding. Innovation and scaling up requires investment and the Net Zero Plan presented early indications of the scale of investment required. This is the problem that still needs to be solved, how to pay for the measures?
- 1.26 Members will have their own individual opinions on working with the private sector to address the city's challenges, but in the absence of public sector funding the city has to be able to have conversations with private sector partners to help the city achieve the scale of transformation required to support a Net Zero city, and indeed sub-region. This is especially so to achieve a 2030 goal. It may be concluded that a devolution type of deal may be necessary to secure the scale of investment required from government to achieve such an ambitious goal as a Net Zero city.

Reflections on the work of Exeter City Futures

- 1.27 In concluding the secondment with ECF I would wish to share reflections on ECF and the important work that has been done to date.
- 1.28 From the inception of ECF there has been a strong desire to support innovation and enterprise, to create a culture that supports start-ups and a strong engagement with the research at the University of Exeter. From the City Council's point of view we have been striving to support a knowledge economy and improve business density, productivity and innovation. Relative lack of business innovation and lower productivity levels is a regional problem. ECF as a disrupter, and a thought leader, as a connector and story teller creating a culture within the public sector to support enterprise was part of the goal, broader than just Net Zero. It focused on supporting wellbeing, local resilience, sustainability, and creating a great place. It addressed the capability of the city to support the required change, and set out areas that needed to be addressed to support the journey, this included: building a culture among the public sector organisations to collaborate, the sharing of data, developing data analysts, developing local finance and mechanisms to support start-ups.
- 1.29 We can all testify to the spirit of collaboration that has been built in the city, there is a level of trust and confidence in the leadership of the city's

institutions that is conducive to working together. ECF has been an important building block on this journey and has put us in a better position to address problems and co-ordinate action at city and regional scale. The data analytics apprenticeship programme was a tangible development that came out of the work, and now points to work by Exeter College on green construction and other sector needs.

1.30 The Velocity programme was amazing and gave clear evidence of both the need and opportunity to support individuals establish businesses working in areas important to the city. It did many of the things that we would wish to see put in place to develop an innovation agenda for us in Exeter and the south west. The companies created through that programme are in their own way contributing to the goal, from Co-Charger to Binit there are good examples of entrepreneurs being supported and they are solving real life challenges.

1.31 ECF produced technical studies, such as Energy Independence 2025, that informed our knowledge of the task ahead in achieving a Net Zero city. Funding numerous pitches and bids to government as a response on behalf of the city of Exeter and sub-region in collaboration with the leading institutions, it helped under line our joined up approach. We have become used to collaborating in pursuit of government funding, but it was not always the case. ECF got out and about at national events promoting the city of Exeter as a leader in the field for tackling climate challenges and ECF has always being prepared to showcase practical work, from individuals celebrated as local heroes to challenging rules on procurement. Numerous, and too many to recall, catapult centres and national programmes have been invited and shown around the city by ECF to emphasise the innovation agenda that was supported by a city living lab concept backed by a visible leadership embodied in ECF. Presentations have been given to other local authorities interested in a whole system change approach to Net Zero and the learning from the city is a useful starting point for others wishing to tackle the challenge in a collaborative fashion among institutions.

1.32 The Exeter Vision statement 2040 is the product of ECF that has been adopted by the Liveable Exeter Place Board and is now embodied in the draft city plan that is out to consultation. This body of work is something to be proud of and has put the city of Exeter in a good position when facing up to the big challenges we face. There is a common purpose among the leadership of partner organisations that recognise our common goal and distinctiveness as a place. It is a proud legacy to build upon.

1.33 Some of the work of ECF has been consciously aimed at engaging private sector companies to assist the city with its mission, encouraging the private sector to see the potential and opportunities associated with partnering a city wide initiative in the areas of carbon reduction. This promotion of the city of Exeter and the transformational agenda ahead has been time consuming and it is not always possible to evidence tangible outputs. However, the leadership

skills of storytelling, resource weaving and designing system architecture have rooted the Net Zero work with a good sense of the implementation challenges and the interconnection of disciplines and connecting themes.

- 1.34 Exeter City Futures produced the Net Zero Exeter 2030 Plan. One of a handful of cities that had produced such a document. It set out the themes, key sectors, and identified the scale of the resources required to achieve a Net Zero city. It was not a fully costed plan based on powers and resources available to the city of Exeter. Rather it was working back from a 2030 goal and looking at the sectors and themes that would need to be addressed informed by knowledge gained from working with businesses and partners. It identified the scale of investment required under each theme, with big ticket items clearly identified. A comprehensive approach to address all aspects of city living to achieve a Net Zero 2030 city is beyond the work of a community interest company with a modest team of staff with no finance. However, building on some earlier work of WSP who had identified the key priorities areas that could be progressed towards the Net Zero goal, a small number of key issues were suggested by ECF Board to test the appetite from partners to progress at pace.

Greenhouse Gas Emissions Inventory

- 1.35 To anchor the work on the Net Zero agenda in a finer grained understanding of the greenhouse gas emissions and sector contributions, and to bring to life the scale of the challenge facing the city of Exeter to get to a Net Zero Exeter 2030, the Centre for Energy and the Environment at the University of Exeter was commissioned to establish a baseline greenhouse gas (GHG) inventory for the city. This would quantify the reductions required to achieve Net Zero in 2030 and identify more specific and timely metrics for monitoring progress towards carbon neutrality in each emissions sector. A linear decline in emissions from 2021 to zero in 2030 requires a decline of 50 kt CO₂e (11%) per year and gives cumulative emissions over the period of 2.2 Mt CO₂e. Under the extrapolated current trend these cumulative emissions would be exceeded in 2026. Members considered the inventory in July 2022.
- 1.36 Lack of progress in the buildings and transport sectors is particularly concerning. Growth in the city is leading to increases in emissions and the decarbonisation of electricity cannot continue to make up for the shortfalls in these sectors. The city needs to make significant progress in buildings and transport to deliver Net Zero. The findings were reported to Exeter City Council's Executive and Council, and ECF was asked to reflect on the challenges of resourcing the step change in activity to meet the Net Zero 2030 Goal and to suggest options for meeting these challenges.
- 1.37 The Council also called 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, in order to explore the practical challenges to securing delivery with limited capacity against the 2030 time line and to report back to the City Council's Executive by December 2022 with a plan of action.

Recent Workshops

- 1.38 Following on from that report ECF has held a series of four themed workshops to explore the challenges and opportunities in making progress on transport, district heat networks, EV battery charging infrastructure and hydrogen.
- 1.39 ***The transport workshop*** facilitated by City Science illustrated the potential ingredients of a more ambitious plan and politicians and partners engaged constructively in the session. The options require tough decisions by the transport authority and there is a need for political frankness with the district council politicians about their willingness to support the transport authority on navigating interventions. Prior to the first round of austerity the county promoted a high quality public transport solution, a large capital investment designed to address the growth in traffic from the sub-region into the city. There is no longer any talk of such bold initiatives. Other cities have made greater progress in managing demands on road space, cities like Oxford and Cambridge have been bolder in their policies, but they have also had greater access to national funding and have been part of growth deals. The tension between the demands of a rural catchment and the needs of the city are not easy to reconcile. There is no single initiative that will make the difference, neither is there an easy route to funding. The county's financial challenges seem to be a constant theme, it could threaten their place shaping role, this combined with the city council's diminishing capacity to intervene with capital investment must raise question marks on our collective potential to reduce the transport emissions. Incremental changes won't be sufficient to meet the Net Zero goal. The step change in support of active travel requires a visible leadership and funding programme. Final word on transport is that we are only addressing existing traffic, not the new growth that is already built into the system over the next twenty years. What was a problem twenty years ago has not diminished today; albeit three new railway stations have been built since 2002, namely, Cranbook, Newcourt and Marsh Barton.
- 1.40 ***Heat networks:*** The City Council and Devon County Council have pursued heat networks and have had a good measure of success, the city has over 3,000 homes connected to a heat network, the City's Local Plan anticipated two further heat networks either side of the River Exe. Significant funding has been invested in business cases and we have learned a lot about the challenges. The workshop held with One Energy illuminated the opportunity to deliver a central network without the local authorities having to contribute to the cost. However, there is an assumption that Government and private sector investment would be required. The request of the local partners is to sign a letter of comfort to the effect that the partners would take the heat. The partners have a mature relationship and no single organisation wishes to disappoint. Individual letters to support a bid for a heat network has been forthcoming from each of the local partner involved with ECF. It is clear a lot of technical work will need to be done ahead of any commencement that partners satisfy themselves on the procurement tests. The work being done in support of district heat networks and the implications for our organisations illustrate how even relatively

straightforward programmes are challenging and poorly understood. ECF has had a positive impact in keeping the organisations engaged on the wider programme and creating a climate to encourage and support one another. The greenhouse gas inventory assumes 11,200 homes being connected to a heat network by 2030. A significant benefit of a city centre network is that it would open up heat solutions for buildings such as the Cathedral.

1.41 *EV Battery Charging Infrastructure is an important enabling condition to achieve a rapid replacement of fossil fuel vehicles with electric cars. The elimination of all non-electric vehicles in the city depends on confidence that vehicles can be charged. The workshop identified some interesting examples of how charging could be provided in public places and how technical issues are being addressed elsewhere in the country. From software to hard infrastructure there are solutions. The workshop at least demonstrated what could be done. The County Council engaged with the workshop and there is a sense the County may pick up some of the learning to progress their policy and solutions.*

1.42 *Hydrogen, has a bit further to travel than many other aspects of the Net Zero work, however, there was a good deal of interest in the potential of hydrogen to contribute to the mix, including heat networks, energy storage and fuel for HGV vehicles. There are a number of work streams being developed in the city and there is a desire to do more in partnership with the city's organisations. Hydrogen would benefit from greater exposure and exploration with rural renewable energy as a possible solution to grid constraints.*

1.43 The workshops illustrated the value of ECF as a convener to shed light onto technology, ideas and opportunities to learn and collaborate. This is a theme that has been constant throughout the company's existence. ECF opens up opportunities and connects in a fashion that is rare but essential if the city is to build an innovation agenda and seeks to collaborate to find solutions. Whilst it need not be ECF the activity is essential.

Legacy projects

1.44 Following on from the workshops there are four legacy projects led by the CEO and GD that the Council is recommended to take forward in 2023 e set out in the table below. Should additional funding be required for any of the projects this will be subject to the normal approvals process.

Project	Aim
Creating a vision for a low vehicle city centre	Engage the public and key stakeholders in the design of a blueprint for the City-Centre as a tool for use by stakeholders in their individual and collective development plans.
Community Energy Pilot	To bring forward a business case setting out proposals to test out models that could scale up domestic retrofit using community development approaches.

Co-ordination of the delivery of the Innovate UK funded Pioneering Places project	The Phase 1 bid provides funding to create a blue print for collaboration across sectors to enable more agile and flexibility joint working on major projects. Successful completion of the project (June 2023) has the potential to open the gateway for Phase 2 funding @£8 million which could be used on a real life project e.g. delivery of a Commercial DHN.
Facilitating the collaboration necessary for the delivery of a city centre commercial District Heating Network	Develop the collaboration that resulted in public sector support for a large funding bid to BEIS in Nov 2022. Should the bid be successful (announcement due Feb 23) this work will need to continue to bring together a single business case across the key public sector partners.

Conclusions

1.45 In my opinion ECF has proven its worth, it has shifted the dial in terms of collaboration and key organisations working together, it pioneered an accelerator programme supporting start-ups and connecting business mentors and funders, it has shaped the vision for the city of Exeter, published the Net Zero 2030 plan and has raised the profile of the city as a leading location for environmental initiatives. Core funding for ECF has never matched the ambition and the scale of the opportunity, this is echoed at regional and national level. The City Council and County Council are financially challenged and the public purse will be under pressure for many years to come. But both organisations have worked well together to tackle projects in spite of the funding pressures. Meaningful progress has been made in many areas of the green agenda but this stops short of achieving the goal. However, today we see the University of Exeter investing in the innovation agenda focused on green futures and Net Zero. They have taken a step change in the innovation agenda and have set out their vision. Led by the VC, Lisa Roberts, it is the transformational opportunity acknowledged across the region and firmly in focus as the significant strategic programme and project for the city. The Council should feel a strong sense of satisfaction that we do have a clear direction of travel where collaboration and innovation are firmly established as the way we do things in Exeter. We see ambition across our institutions and a mature working environment.

- **How does the decision contribute to the Council's Corporate Plan?**

The Exeter Vision 2040 is to be carbon neutral by 2030.

8.2 Exeter City Council has declared a climate emergency and set a goal to be carbon neutral by 2030.

8.3 The Net-Zero Exeter 2030 Plan contains actions that support the corporate priorities of:

- Tackling congestion and accessibility

- Promoting active and healthy lifestyles
- Building great neighbourhoods

- **What risks are there and how can they be reduced?**

1.46 There is a wealth of evidence reviewed by the Mission Zero, Independent Review of Net Zero, the challenge is meeting the 2050 goal no one is talking about a credible plan to achieve a 2030 date, but this should not stop us pursuing an ambitious 2030 goal. There is a significant risk that a Net Zero Exeter will not be achieved by 2030 based on a linear trajectory to the target date. That is a reasonable reading of performance measured against the targets contained in the Greenhouse gas emissions report. The risk is mainly reputational rather than legal or financial consequences. There is a challenge to measure or weigh the benefits of early investment in energy, retrofit, and transportation changes ahead of the 2030 goal. Treating Exeter as a self-contained carbon island does not make sense. The city functional area extends well beyond the city, new communities on the edge of the city will function as extensions of the city, travel patterns and pressures on resources will not respect municipal borders. Therefore it is reasonable for decision makers to question why would the city invest ahead of national targets should that investment come at the cost of reducing local authority services or switching funding from service in order to deliver capacity and investment to save carbon. However, if part of the reason for accelerating progress is to demonstrate a USP in the area of research and applied practice that would support new jobs and increase investment appetite in this location to support important technological breakthrough and positive economic returns for the city of Exeter, then that may suggest early investment is a sensible necessary condition to prove Exeter's global leadership in an area that the investment market is quickly realising is the future for all of us. The international and national advantage for any community to be at the vanguard of history is powerful in shaping the long term standing and reputation of cities and countries. This is the essence of the city pitch being made consistently to regional and national bodies as to why they should be supporting the transformational opportunity at Exeter. Reputation risk is therefore important.

1.47 Living with the impact of climate change is a reality for all of us, adapting to climate change will be necessary and Exeter is at risk from the impacts of climate change. The weight that Members give to leading this agenda is therefore something to be weighed alongside the real cuts that have to be found for the council as a whole. However, what is clear is that Members cannot expect to hold officers and fellow councillors to account for delivering on a most ambitious Net Zero 2030 goal without the appropriate resources to achieve. In that regard the Net Zero Plan identified a requirement for hundreds of millions of pounds to support the transition. However, it is important to point out that significant sums of investment has been found by government to support retrofit programmes, hydrogen, technical studies, and development of business case, transport initiatives and many more projects. It is clearly possible indeed probable that when the city shows evidence of collaboration and ambition

greater sums of money to support the Net Zero agenda will flow. There is therefore a risk that being seen to pull back from the good work done to date would impact negatively in future funding rounds. The City whether through the county or City Council has a good track record of securing one of pots of funding for projects.

1.48 Therefore it is important to understand the spirit in which such a strategy is pursued, establishing a USP that says the city is up for innovation and collaboration in pursuit of a Net Zero 2030 goal is one that could credibly be achieved, holding the Council to task to meet the Net Zero 2030 goal is altogether different. It is respectfully suggested that Members need to clarify what success looks like for the medium term.

- **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.

REPORT Authors: Delete/complete one of these paragraphs (see guidance link and EQIA Template)

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because: because

11.4.1 The report is for information only

- **Carbon Footprint (Environmental) Implications:**

12.1 Important to complete this section in light of the Council declaring a Climate Emergency. Consider whether the recommendations you are making in the report will help, hinder or have no direct impact on delivering our carbon reduction target (carbon neutral by 2030).

12.2 You should think about things like:-

- Travel (and, if travel is unavoidable, whether lower carbon options will be pursued e.g. walking, public transport, electric car);
- Infrastructure (e.g. LED lighting, energy efficient heating/hot water, solar panels, electric car charging points);
- Waste (e.g. recycling, composting, reducing non-recyclable waste); and
- Any other specific carbon reduction initiatives.

12.3 If there are no direct carbon/environmental implications for the decision please state:

No direct carbon/environmental impacts arising from the recommendations.

- **Are there any other options?**

Director Karime Hassan

Chief Executive & Growth Director

Author: Karime Hassan

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

Background papers used in compiling this report:-

Council resolution 23rd July 2019

Executive report 9th July 2019

Exeter City Futures CIC Net Zero Exeter 2030 Plan report to Executive
2 June 2020

Exeter City Futures Net Zero Plan published April 2020

Mission Zero, Independent Review of Net Zero, Rt Hon Chris Skidmore MP,
assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1128689/mission-zero-independent-review.pdf

The Exeter Development Fund – Update

This project was originally funded and commissioned as part of the City Council's One Public Estate programme. This element is complete and resulted in the publication by Exeter City Futures of an Outline Business Case (OBC) for the Exeter Development Fund ('The Fund'), in May 2022.

The OBC established the concept of the Fund - as a public sector owned, replicable and fundable model that enables delivery of Liveable Exeter and the eight strategic brownfield sites identified in the emerging Exeter Plan. The key principles which underpin the Fund concept are that it would: utilise public sector land assets to finance housing led mixed use development at pace and at scale; take the role of funder and developer and recycle the uplift in land values into its future pipeline of housing development, innovative transport infrastructure and energy transition away from fossil fuel reliance; Control will rest with public sector land owners, rather than private developers; schemes can be designed for place-making rather than profit and; Land will be retained rather than sold, and income will be generated from rentals.

These key principles had the full support of the project partners, including Exeter City Council. However as the OBC is focused on all eight Liveable Exeter sites, the funding required for the whole portfolio was assumed to be unrealistic. Focusing the work on a single 'flagship' site, to test the concept further, greatly reduces complexity and risk and makes the funding 'ask' more affordable - whilst still fitting in with the Fund principles. This is the most practical and deliverable approach.

Exeter City Council has secured further government funding to progress the exploration of the Fund to full business case. New governance arrangements have been put in place, and the Director of City Development is leading the work, reporting directly to a Strategic Scrutiny Committee 'Task and Finish Group'.

An assessment matrix has been used to select Southgate site as the flagship site which includes the existing Magdalene Street car park. A stage 2 Feasibility Study is underway to test strategic highway solutions and design development of the former car park site.

When considering the Fund option, whilst focus will be on appraising the flagship site, the other Liveable Exeter sites will be considered at a high level.

The expected outputs from this work will be a Full Business Case for the Exeter Development Fund and a proposed development capable of delivering circa 170 new homes. The work will be completed towards the end of next year.

REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

REPORT TO COUNCIL

Date of Meeting: 17 October 2023

Report of: Chief Executive

Title: Review of Exeter City Living

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 This report reviews the current position of Exeter City Living (ECL), a wholly-owned council housing delivery vehicle which was incorporated in June 2018. The review was commissioned by the Council following the failure to secure a contract for the redevelopment of the Clifton Hill site and the continued uncertainty around development given the difficult current economic climate. These difficulties highlighted issues relating to the financial position of ECL and its continued ability to repay its loans to the Council.

1.2 The recommendations set out within this report are supported by an independent review by Local Partnerships. The Local Partnerships Report can be found in Appendix A.

2. Recommendations:

That Executive recommends to Council:

2.1 That the findings of the Local Partnership LLP report be noted.

2.2 That ECL's achievements to date be noted;

2.3 That Members note that notwithstanding the recommendation from Local Partnerships to wind down operations of ECL, officers recommend that the company be retained for the limited purpose of holding and managing property.

2.4 In order to facilitate the recommendation in paragraph 2.3 above, that delegated authority be granted to the Chief Executive, in consultation with the Leader of the Council, to reduce ECL's activities as follows:

- a) the Council enters into a business sale agreement with ECL, whereby the Council acquires all of ECL's assets (with the exception of the 6 leasehold flats in the Guildhall Shopping Centre), including any work in progress in return for proper consideration, in the form of a release of ECL from its obligations under the Loan

Agreements. The sale agreement shall include a novation of all contracts save those that may be terminated by ECL with the Council's agreement.

- b) In the likely event that the value of the assets to be acquired from ECL is not sufficient to repay the loan to the Council, then delegated authority be granted to the Chief Executive, in consultation with the Leader and Section 151 officer, to write off any shortfall.
- c) Thereafter, ECL, in a much reduced capacity shall continue for the purpose of holding and managing property and in particular the 6 Guildhall flats.

2.5 That the Council deals with any staff implications in accordance with its Organisational Change Policy;

2.6 That the ECL appointments of the Interim Managing Director and the two non-Executive Directors are extended until such time as they are no longer required to assist with the reduction of the company's activities. The termination of those appointments be delegated to the Chief Executive;

2.7 That authority to amend the Management Agreement to reflect the changes to the remit of ECL be delegated to the Service Lead - Legal Services;

2.8 That SMB reflect on the Local Partnerships report as well as work being undertaken by the District Councils Network on commercial companies owned by local authorities to produce a report in due course setting out principles for how the council will enter into any commercial ventures in the future.

2.9 That the Chief Executive be tasked to liaise with One Public Estate to negotiate an amendment to the grant conditions with the aim of retaining the Brownfield Land Release Funding (BLRF) funding where possible.

2.10 If necessary, Members agree to receive a report setting out a site disposal strategy in the likely event of a shortfall on the ECL loan after the Council acquires ECL's assets.

3. Reasons for the recommendation:

3.1 To minimise financial risk to the Council and to put the Council's development activities on a sustainable footing.

4. What are the resource implications including non financial resources

4.1 Excluding any loan shortfall highlighted in paragraph 2 (4) (b) above, the resource needed to reduce ECL's activities should largely include officer time. At this stage, it is too early to know what impact this will have on the staff at ECL. Work will be done to identify if those staff can be redeployed elsewhere in the council.

5. Section 151 Officer comments:

5.1 The objectives and intentions of ECL were ambitious and in line with Exeter's aspirations. The challenging environment caused by external factors, have meant that a reduction in the capacity of the Company is financially prudent at this time. The financial implications have been set out in the finance section below and demonstrate the impact

on the Council. It is important that the Council has regard to the future management of the flats located within the Guildhall Shopping Centre. At this stage it is not envisaged that the debt will require the sale of any assets that were not already earmarked for re-development.

6. What are the legal aspects?

6.1 There is a reasonable prospect of ECL avoiding an insolvent liquidation if arrangements are made now in line with the recommendations set out in paragraph 2 above. Without intervention from the Council, ECL would be insolvent.

6.2 The recommendation to acquire ECL's assets, enables the Council to retain ownership of the land at Clifton Hill and therefore control of any redevelopment proposals for that site.

6.3 The recommendation in relation to retention of the 6 leasehold flats protects the Council's commercial interest in the Guildhall Shopping Centre. In short, this ensures that the Guildhall Shopping Centre remains free of any encumbrance that may restrict or negatively impact on its future use as a commercial interest.

7. Monitoring Officer's comments:

7.1 Unless the actions proposed in this report are acted on swiftly, ECL is at risk of going into insolvent liquidation. Therefore, the Council's review has been both prudent and timely.

7.2 ECL was set up with the very best of intentions but as a commercial venture, it was susceptible to market forces which have had a significant, negative impact on its viability for the reasons set out in this report.

8. Report details:

Background

8.1 The review of ECL was initiated in April 2023 due to the following concerns:

- Failure to secure a contract for the development of the Clifton Hill site and concern about the viability of the existing development pipeline in the face of a challenging development environment;
- Concern about ECL's ability to repay its loan from the Council; and
- A need to ensure that there was appropriate governance relating to ECL's future direction and activity.

8.2 ECL is a housing delivery vehicle which was incorporated in June 2018 and is a wholly- owned subsidiary of Exeter City Group (ECG). The vehicle was established to provide much needed housing in the city to help tackle the housing crisis. The idea was that the company would also generate an income stream for the council at the same time as unlocking sites that other developers were unable to.

8.3 ECG and ECL were established at the time when the Housing Revenue Account cap was still in effect. At that time, provision of council housing was constrained by national policy regarding the ability of councils to borrow against the HRA, a policy which was

reversed in October 2018. The intention had been that affordable housing would be delivered by ECL through the planning process.

8.4 The five years since the incorporation of ECL have been the most unstable market conditions since the 1940s with a series of events:

- A global pandemic;
- The invasion of Ukraine;
- Significant rises in interest rates; and
- Prolonged uncertainty relating to the terms of the BREXIT deal.

8.5 These factors have created enormous uncertainty in the market with significant inflationary pressures in the economy which have increased the cost of materials, labour and transportation.

8.6 When ECL was established, potential development sites were identified and work began on understanding the viability of bringing these sites forward for development. Two key sites originally identified for potential development were Northbrook Golf Course and Clifton Hill.

8.7 In July 2019 Executive decided to put the future of the Northbrook Golf Course out to public consultation, a site that had been assumed would come forward for development. Subsequently Executive formally resolved not to bring forward Northbrook Golf Course for housing but instead to include the land as strategic green infrastructure. This removed a potentially profitable site from the development pipeline early on in the programme.

8.8 With regards to Clifton Hill, in early 2019 there was a Council resolution to sell the whole site. By the autumn of 2019 there was a commitment from the Council at that time to keep the green space including the Golf Driving Range and Ski Centre and only develop the smaller brownfield section at the front of the site (the area of existing buildings).

8.9 The procurement of a building contractor to build the Clifton Hill development has been unsuccessful to date. Following a two-stage tender process, the successful contractor from stage one of the process was unable to submit a fixed price, in the second stage of the tender. Without a fixed price, there was a risk that the anticipated construction costs would be too high to enable the development to deliver a financial return suitable to cover the normal development risks, such as fluctuations in selling prices. The project has therefore been put on hold until more certainty and competition return to the construction sector, and a new procurement process for a contractor can be carried out with more confidence.

ECL Achievements:

8.10 Despite a challenging backdrop, ECL has been successful in completing three sites providing 22 homes and has two developments under construction which will provide 56 homes by the end of 2024.

8.11 Future phases on one of these sites can provide a further 56 homes with construction continuing without further procurement or delay, subject to viability and instruction from the HRA.

8.12 A further site to provide 41 homes is cleared and ready to start construction when economic conditions improve. A full summary of ECL activities and achievements can be found in Appendix B.

Current work being done by officers to ensure the Council continues to deliver its housing aspirations and reduce the financial impact on the Council of the proposals within this report.

Without pre-empting Members' decision, officers, mindful of the need to work to move at pace have undertaken the following work:

1. Finance

The report from Local Partnerships refers to the risk that the Council has breached the Prudential Code as ECL have been using borrowing to finance their running costs, and to repay the loan and interest. The Prudential Code governs capital spend in Local Authorities under the Local Government Act 2003 and must be followed by a Council. At this point in time, there has not been a breach by the Council, as ECL has generated a turnover in its five years of existence more than the total of running costs, interest and loan repayments. However Local Partnerships are correct to recognise the fact that with the absence of open market sales in the near future, there would come a point where this would become unsustainable and the Company would likely require an equity injection to continue trading, whilst avoiding a breach of the Prudential Code.

Members will recall that Council has approved loans with a value of £24.950m for ECL. To date, ECL has borrowed £10.850m from the Council and has repaid £0.754m leaving £10.096m outstanding. The Council has taken a cautious approach to lending the funds to the Company to ensure that risks to the Council are minimised, whilst ensuring that the Company has sufficient funds to operate. Due to a range of factors, including the limited scale of development and the uncertainty of securing a future pipeline of sites, ECL no longer anticipates generating capital receipts for land, and only nominal development profits.

In order to address the loan, the Council can negotiate a value for the assets of the Company. The assets are held as work in progress, debtors and cash. The only debtor is the Council as the majority of their sale transactions at this stage will be in respect of the Vaughan Road development. The work in progress will include the value of the land at Clifton Hill.

Based on the Company's latest accounts, they have work in progress totalling £4.04m and cash in the bank stands at around £1.8m. The work in progress figure will be subject to change as we are updating the valuation of Clifton Hill. The amount in the bank will also change as the Company ensures that any outstanding creditors are paid and an amount is left in to allow the Company to continue to operate.

If the Council agrees a managed reduction in the size and type of activity of ECL as recommended, then the Council will be required to write off any remaining outstanding element of the loan. This will leave ECL as a Company with a small amount of positive assets that could continue to hold the flats at the Guildhall Shopping Centre.

In terms of financial implications for the Council, the transfer of the assets of the Company will be used to either pay down the debt associated with the loan (in the case of cash) or the associated debt will remain part of the Council's repayment of debt calculation but attached to the new asset. Repayments will be made in lieu of the loan repayments over the remainder of the 25-year loan.

In respect of any write off in respect of the loan, there will be no immediate impact on the Council Taxpayer, other than for the Council to make repayments in lieu of the loan repayments from the Company. However as there is no longer an asset associated with this debt, the Council will need to make arrangements to repay the debt as soon as is practicable. The options for this are to sell assets to generate capital receipts or to set aside revenue resources. Depending on the value of debt outstanding, it is likely that the sale of an asset (or assets) will be required.

Valuers have been appointed to appraise the sites which have been identified for redevelopment. The outcome of this work will help to identify the sale of site(s) to address the debt.

ECL also provides an income to some of the General Fund Services - Finance, Legal, Planning - for staff or service support. Work will be done to address this loss of income. It is important for Members to remember that this income has offset the need for further reductions in council services, that otherwise would have been required from 2018.

The financial implications for the General Fund are as follows:

- Additional repayment of debt £340,000
- Loss of interest £530,000
- Loss of income to services £160,000

- **Total** **£1,030,000**

Whilst most of the impact of loss to the services can be mitigated through utilising vacant posts, the debt repayment and loss of interest will only be mitigated when the asset sale occurs. At this point the PWLB loans will be reallocated to fund part of the existing approved capital programme (and Members will note that these existing loans are at a much lower interest rate than we can currently receive). As mentioned earlier, these cost pressures have been avoided during the period of ECL and essentially relate to savings that were required to be made in the late 2010's.

2. Securing and retaining BLRF funding

The Council has been successful in receiving grant funding from the Government's One Public Estate (OPE) programmes, including the BLRF. The grants have been awarded to enable housing development on 8 Council owned sites across the city. A key milestone is the securing of 'Land Release' and this has already been achieved on two sites, Clifton Hill and Vaughan Road. Clifton Hill was sold to ECL and has planning permission. Vaughan Road is being developed for social housing under the name of `The Gardens, Whipton`, with construction commencing on the first phase of 35 homes in March 2023.

The Belle Isle, Exeter Water Sports Association and Mary Arches Car Park sites are part of ECL's current Business Plan and are in its development pipeline. The BLRF grant funding for these three sites is approximately £2.5m. ECL has been developing scheme designs, addressing delivery challenges and modelling viability for the sites. All three sites have a Land Release deadline of 31st March 2024 with previous intention that land release would be achieved by selling the sites to ECL.

It will be necessary to engage One Public Estate to explore whether the terms of the Funding Agreement terms can be altered (particularly the Land Release milestone deadline) in order to attempt to retain the funding secured on these sites until an appropriate, alternative land release mechanism can be activated.

3. ECL staff

The consideration of the impact of the proposals on staff working at ECL will be addressed through the Council's organisation change policy.

It will be important that the Council continues to work closely with officers from ECL to implement any recommendations agreed by Members. It is therefore proposed that the ECL appointments of the Interim Managing Director as well as the two non-Executive Directors are extended in accordance with the recommendation set out in paragraph 2.6 above to assist with the reduction of the company's activities.

4. Developing delivery plans for current ECL sites

The Director of City Development and Housing leads an officer Delivery Team that works across the Council to unlock major brownfield regeneration sites for homes and identified in the Exeter Plan.

The Team has prioritised the preparation of delivery plans and business cases for infrastructure investment and funding for the ECL portfolio of sites, in particular Clifton Hill, Mary Arches car park, Belle Isle and EWSA Canal Basin.

5. Working with the ECL Board

Throughout the duration of this review, the Council has worked closely with the ECL Board to set out the specification for the Local Partnership Review as well as consideration of the findings. ECL staff have been appropriately engaged.

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

9.1 This decision will contribute the Council's strategic priorities of 'Housing and Building Great Neighbourhoods and Communities' and 'Leading a Well-Run Council'.

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

10.1 That ECL continue to accrue debts and therefore increases the amount of its outstanding loan to the Council without a plausible repayment strategy.

10.2 The risk to the Council of the failure of ECL to repay the loan provided by the Council.

10.3 The Council will need to provide an equity injection into the Company to avoid a breach of the Prudential Code. An equity injection will mean that the additional cost will fall on the Council with no prospect of income to offset the cost.

These risks can be mitigated by approving the recommendations at the beginning of this report.

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 relation to this report, no potential impact has been identified on people with protected characteristics as determined by the Act because the proposals do not reduce or change services to the extent that they will impact on any individuals including those with protected characteristics.

12. Carbon Footprint (Environmental) Implications:

12.1 Regardless of the future delivery model for housing development by the Council, the Council intends to deliver homes to a high environmental standard. .

13. Are there any other options?

13.1 The Council could continue to fund ECL but introduce more rigorous governance arrangements such as the establishment of a Members Shareholder Committee to enable more transparent scrutiny of ECL. However, the financial projections in the latest ECL Business Plan clearly show that there is no likelihood of ECL being able to repay the debt owed to the Council in the foreseeable future and therefore retaining ECL in its current format is likely only to incur more costs the Council.

13.2 For ECL to continue in its current form, further financial assistance would be needed during the current financial year. Given the challenges with delivering open market developments, as outlined in this report, this is not recommended.

Chief Executive, Bindu Arjoon

Author: Chief Executive, Bindu Arjoon

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

Background papers used in compiling this report:-

None

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HM Treasury



EXETER CITY COUNCIL: REVIEW OF EXETER CITY LIVING

Version No: FINAL

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1 CONTEXT

1.1 Background

Exeter City Living (ECL) is a housing delivery vehicle which was incorporated in June 2018 and is a wholly owned subsidiary of Exeter City Council (ECC). The vehicle was established in order to address market failure in the availability of social housing by delivering new homes to a high environmental standard, and with the intention that any profits realised are sown back into improving the local community.

In the five years since ECL was established, there have been a number of significant policy changes and challenges faced by ECL.

ECL was established when the provision of council housing was constrained by national policy regarding the ability of councils to borrow against the housing revenue account, a policy which was reversed in October 2018.

Since the establishment of ECL, there has also been a series of national shocks including uncertainty in the trade terms associated with the United Kingdom's departure from the European Union, the global pandemic, the invasion of Ukraine by Russia, the fall in sterling and recent dramatic increase in the Bank of England's base rate (from 0.1% in December 2021 to 4.25% in March 2023).

To date, ECL has borrowed around £9m from ECC. Due to a range of factors, including the limited scale of development and the prioritisation of Passivhaus design principles, ECL no longer anticipates generating capital receipts for land, and only nominal development profits.

The review of ECL by Local Partnerships is a project which has been requested by ECC as an independent review. The review will be on behalf of ECC and presented to ECC, though will involve consultation with relevant officers at ECL.

1.2 Scope of the report

ECC is keen to ensure that its relationship with ECL is underpinned by effective governance arrangements. As such ECC commissioned Local Partnerships to undertake a short, independent review, the purpose of which is to:

- Examine ECC's arrangements for governance and oversight, focusing on:
 - ECC representation on the ECL Board in terms of skills, experience, relevant knowledge, and segregation.
 - Identifying areas where greater transparency may be required.
 - How ECL's output priorities (financial returns vs Passivhaus standards vs affordable homes etc) are set, managed, and communicated.
 - ECC internal governance for authorising expenditure on projects.
 - ECC decision making process and delegated approval process.
 - Perceived communication issues around briefing and reporting.
 - The appropriateness of the skills and experience on the ECL Board Structure.
 - Whether the Management Agreement can be reviewed and updated to make it more workable.
 - How ECL financial performance is reported within ECC and aligns with ECC's financial planning.
- Identify any necessary additional client support arrangements.



- Assess if ECL is achieving its stated objectives and providing value for money, considering:
 - Development costs charged to each project; and
 - The administration of ECL and the associated companies.
- Identify key risks to ECC (including financial risks).
- If there are material concerns around the governance and performance of ECL whether there are recommendations that could make it a viable development vehicle in the short to medium term.
- Whether there is a reasonable likelihood of ECL being able to pay down its £9.8m of outstanding debt in the foreseeable future and whether ECC should consider winding down the vehicle if it is not meeting its stated objectives.
- Whether ECC could and should provide further financial support and whether it could utilise CIL or commercial property revenues to fund the vehicle.
- If ECL isn't likely to become a self-sufficient commercial vehicle, in the short to medium term future, whether there is the scope and potential to transfer the development skills assembled over to ECC.
- Whether the work being undertaken for the Housing Revenue Account ("HRA") would be better delivered in house.
- The implications for the Brownfield Land Release Fund ("BLRF") monies secured if the vehicle is wound down.
- How ECL staff resources could be re-allocated within existing ECC departments.
- If the recommendation is for the vehicle to be wound down what alternative delivery strategies could be available to the Council.
- Recommendations and proposals for future work required.

1.3 Approach

Our work was principally undertaken through two stages.

1.3.1 Document review

We reviewed a wide range of documentation including:

- Key Executive and Scrutiny reports
- ECC Business Plan and other key documents relating to performance to date
- Key governance documentation such as the Management Agreement, Articles of Association, Shareholders Agreement and any financial agreements
- ECC's Medium-Term Financial Plan
- The original business case which resulted in the creation of ECL
- ECL audited accounts

1.3.2 Consultation meetings

This stage involved ten consultation meetings with a range of elected members, senior ECC officers, ECL Board members, and ECL staff.

These meetings enabled us to gather a range of views on the performance of ECL, its fitness for purpose to achieve wider objectives for ECC, ECC's oversight and governance of ECL and the risks and management of risks.

2 STRATEGIC APPROACH

2.1 Policy Context

ECC has identified a major programme of brownfield regeneration, known as Liveable Exeter - a 20 years development programme that will be examined in the context of the Local Plan process.

The Liveable Exeter vision envisages densification of the urban form to achieve the number of homes required to meet Exeter's housing need over the next twenty years.

Presently the City of Exeter has provided for house building in large urban extensions at the edge of the city, e.g. Monkerton / Hill Barton, Newcourt, and Pinhoe - that is the strategy of the current local plan.

The volume of house building (mainly in large urban extensions at the edge of the city) has been high.

The Local Plan requires a minimum of 75% of the growth in student numbers to be met by purpose-built student accommodation. Since 2006/07 the number of students studying at the University has increased from just over 11,000 to 23,500 in 2020/21.

The numbers of students requiring specific accommodation in the period increased by 11,500. During this period just over 8,000 bed spaces in purpose-built student accommodation has been provided. This demand for student accommodation has driven up rental levels and is driving high demand for land that comes available in the central area of Exeter.

2.2 Objectives

The strategic objectives which ECC set ECL were clearly set out in the original Cabinet reports which approved the establishment of ECL in 2018. These were:

1. To deliver new homes, more affordable homes in the City.
2. To contribute to a greener city through delivery of low carbon, Passivhaus standard homes, green infrastructure etc.
3. To contribute to a safer city through regeneration of estates and reinforcement of 'urban villages' across the city.
4. To provide Exeter City Council with a return on capital investment and a new revenue stream.
5. To unlock sites not viable for private sector delivery.
6. To intervene in the market, providing commercial developments benefitting the City (such as increased business rates).

Furthermore, the rationale that has been given for the existence of ECL over time seems to have changed on several occasions, without the Council taking stock.

For example, in May 2020, ECL was describing its rationale as

- Enabling the Council to capture more value from development (rather than private developers doing so)
- Allowing the Council greater control over the nature of development
- Enabling the Council to respond to the Climate Emergency and Net Zero

- 'Creating disruption in the market' [*a new objective which the Council never set ECL*]
- Ensuring development continuity
- Mitigating risk

By February 2022, when the 2022-23 Business Plan was developed, development of homes to a passivhaus standard had become ECL's default position and net zero urban regeneration seems to have become the central focus of activity. However, these critical shifts in the focus of ECL's work seem to have taken place without proper consideration by members (over and above approval of the business plan), and without consideration of the tensions between them.

While each of the original objectives for ECL are in themselves entirely legitimate objectives, over the course of our work, it became apparent that there were unresolved tensions between these objectives, particularly given the challenging nature of the sites which ECL have been tasked with developing. For example, while objective 5 (the unlocking of sites not viable for private sector delivery) may be possible – for example through a council owned company foregoing some or all of the developer margin on developments – it is unlikely that this could be achieved at the same time as objective 4 (delivering a return on capital investment and new revenue stream). This tension between objectives is further exacerbated by objective 2 (a commitment to low carbon homes), which is highly likely to increase costs and therefore reduce returns. Given the financial shocks since the establishment of ECL in 2018, delivering returns is in any event significantly more challenging.

While it may be possible, at a programme level, to achieve all six objectives, with different developments contributing to different objectives (for example the development of a lucrative site cross-subsidising less viable sites and still enabling a return to the council) this does not appear realistic given the pipeline of sites which ECL have been requested to bring forward, with significant viability challenges.

The interviewees we spoke to all agreed that there were unresolved tensions between these objectives. There appeared, from our interviews, to be an emerging view that delivery of a financial return was a secondary objective, behind delivery of new homes on identified sites, as long as sites were not being delivered at a loss to the council.

It is our view that ECC should confirm its priorities for housing interventions, which it is looking to ECL – or alternative arrangements – to deliver.

ECC should agree a refreshed, prioritised set of strategic objectives which it is trying to achieve through its interventions in the housing market.

2.3 Governance and communication

When ECC was established, there was an initial expectation that ECC would be comprised of a number of companies, namely:

- Exeter City Group Ltd - the holding company;
- Exeter City Living Ltd - the development company;
- Exeter City Homes Ltd - the residential property company; and
- Exeter City Living Property Ltd - the commercial property company

Under this model, ECL, as a development company, would generate surplus for future investment. Exeter City Homes (ECH) would be a housing company managing PRS



housing. ECH and Exeter City Living Property Ltd would lie dormant until full council gave approval to operate. To date, these have not been actioned, and as such our review focused only on ECL.

The scheme of delegation for ECL clearly sets out the respective roles in approvals, as set out in the table below:

Table 1: Delegation Arrangements

Body	Approval
Council	<ul style="list-style-type: none"> - Business Plan adoption - Expenditure of more than £500k - Operating outside of Business Plan - Issuing of loans - Winding up - Contracts (which may impact Teckal status) - Constitutional amendments - Setting up JVs - Asset disposals outside of business plan
Shareholder Representative (ECC Chief Executive)	<ul style="list-style-type: none"> - Business Plan amendment - Expenditure up to £500k - Use of surplus profit - High risk contracts - Financial operation - Appointment of directors & MD
ECL Board	<ul style="list-style-type: none"> - Funding applications and agreements - Financing (within Business Plan) - Contracts (within Business Plan) - Bonus schemes - Management of staff and consultants - Assets disposals outside of Business Plan

We heard a range of views on the existing governance arrangements for ECL – with some interviewees feeling that ECL would benefit from being ‘unshackled’, while others felt that the Council had insufficient visibility of the decision making processes. We heard that the Board of ECL has the requisite skills on board to enable delivery, but that there were perceived issues around remoteness from the Council’s wider decision-making processes.

A previous review of governance for ECL had led to the introduction of ECC’s s.151 officer onto the ECL Board, a decision which was – correctly, in our view, due to potential for conflict of interest - subsequently reversed.

The governance arrangements for council owned companies should seek to ensure a balance between:

- The company having sufficient freedoms to achieve its objectives
- The council having sufficient control to ensure that its investment is protected, appropriate returns on investment can be obtained and that the activities of the entity are aligned with the values and strategic objectives of the council.

In our view, the delegation arrangements as set out above strike an appropriate balance between these objectives.

However, we did also hear concerns about the lack of elected member understanding and engagement with the work of ECL, particularly in relation to those functions undertaken by the Council as Shareholder Representative.

Clearly any recommendations on governance arrangements are reliant on ECC deciding to retain ECL as a wholly owned company, but should it choose to do so, we feel that there would be some merit, for the purposes of transparency, scrutiny, and understanding, in the establishment of a shareholder committee.

Should ECC decide to retain ECL, it should consider the establishment of a members Shareholder Committee in order to enable more transparent scrutiny of ECL. Terms of reference could include:

- **Oversight of decisions requiring approval by the Council, such as business plan approval**
- **A mechanism to communicate the shareholder's views to ECL**
- **A means to evaluate the effectiveness of the ECL board and the delivery of performance against strategic objectives and the business plan**
- **An articulation of what success looks like in terms of achieving social/ economic outcomes and/or financial performance**
- **A holistic review of risk to the council offered by ECL activities**

2.4 Performance

2.4.1 HRA

At the point of establishment in 2018, the aim was for ECL to deliver five smaller housing developments, replacing 16 poor quality homes and designing and building 115 net additional homes. 43 of those homes were to be in the first 12 months.

Very shortly after the establishment of ECL - on 29 October 2018 - the government confirmed that the HRA borrowing cap was abolished with immediate effect.

As a result, stockholding local authorities such as ECC who have an HRA are no longer constrained by government controls over borrowing for housebuilding and are able to borrow against their expected rental income, in line with the Prudential Code.

Inevitably, this represented a major change to the intended relationship between ECC and ECL, as ECL moved away from direct delivery of homes which ECC would manage through the HRA, to a development agency service, managing the delivery process on behalf of ECC.

Given this change – so early in the company's life - some interviewees were of the view that a pause and review would have been helpful at that time.

Performance in delivery of HRA schemes has in some cases been challenging.

Three HRA schemes are now complete. These include a development of three homes at Anthony Road, which was not originally envisaged as an HRA scheme, but the HRA stepped in to purchase the properties when ECL was unable to sell those properties on the open market. As they were not designed for the HRA, we heard a view that more properties could have been developed for the HRA at a cheaper rate, but we also heard a view from ECL that there was interest from RSLs.

Thornpark Rise (a 9 unit scheme), and Bovemoors Lane (10 units) were developed for and acquired by the HRA and are also now complete.

Construction of Hamlin Gardens (21 units) is well under way, with the scheme now 40% developed and an estimated completion date of September 2023 (this scheme was originally scheduled for completion in December 2019).

Completion of the Hamlin Gardens scheme will lead to the delivery of the 43 homes for the HRA some three years after the Council originally expected to reach that stage. A further scheme has now been developed at Vaughan Road (88 units). This scheme, for which a contract has now been awarded for Phase 1, was originally intended to be for open market rent. However, due to viability issues, and the opportunity to lever external funding for social rent through the Affordable Homes Programme, this scheme will now be an entirely HRA scheme. For this scheme, a December 2024 completion date is scheduled.

We consistently heard from interviewees that the skills which the ECL staff team brought to the delivery of these HRA developments were highly valued, and instrumental in bringing these developments forward.

However we also heard that there had been costs incurred to the HRA which may have been avoidable. These include the HRA stepping in to acquire high specification properties at Anthony Road which could not be sold on the open market (though ECL believe that they could have been sold to other RSLs), and the appointment of various consultants outside of the control of the Council, through the HRA (though we heard from ECL that they believe that these appointments saved the HRA money).

While there is no doubt that ECL has added value to the HRA through its ability to develop sites, there does not appear to be a robust process in place to ensure that the HRA is securing value for money for its investment.

Without, for example, a job recording system, it is not possible to accurately determine how much staff time has been spent on HRA sites, or the balance between HRA and other sites. Should ECL continue to deliver works on HRA sites on behalf of the council, a form of time recording system will need to be introduced.

Should ECL continue to deliver work on behalf of the HRA, the Council should request that it introduces a form of time recording system for work undertaken for the HRA, to enable it to ensure appropriate levels of charging to the HRA, and assess value for money.

2.4.2 Brownfield Land Release Fund

The development pipeline for ECL was boosted by a number of successful BLRF bids were secured in 2021-22:

Table 2: Successful BLRF bids

Scheme Name	BLRF Grant Funding
Bonhay Meadows	£1,009,970.00
Exeter Canal Basin	£600,000.00
Mary Arches Car Park	£1,310,000.00
Belle Isle	£637,417.00
Cathedral & Quay Car Park	£2,373,183.00
Total	£5,966,470.00

Section 3 of this report (and the accompanying Appendix 1) gives more details on the significant delivery challenges faced in taking forward these sites. These have included the need for wider masterplanning exercises, community opposition, archaeological and structural issues, contamination, the relocation (or retention) of existing tenants, and sites needing vacant possession (which may require CPOs), and unsuccessful procurement exercises. At this stage, none of these schemes are as yet on site.

There have been several issues in this part of the pipeline arising from insufficient alignment between ECL and ECC. This has included, for example, assumptions being made by ECL about vacant possession which ECC had made no budgetary provision for, and bids for BLRF being submitted with insufficient visibility for ECC.

The BLRF funding secured – which will be drawn down when needed to fund works undertaken on sites - is dependent on the council commencing work on site, or transferring land (which could be to ECL) within certain deadlines, though the actual developments enabled by BLRF can be delivered at any ‘reasonable time’. ECC should review each site on a site by site basis to consider what works can realistically be commenced, for developable sites, in order to ensure that the funding agreements for BLRF do not lapse.

2.4.3 Summary

To date, all developments that have been completed or taken forward by ECL have been HRA schemes. Since the removal of the HRA borrowing cap in October 2018, shortly after ECL’s establishment, any of these schemes could have been delivered by the Council directly, as part of an HRA development programme.

Delivery of the BLRF funded schemes is proving extremely challenging due to the nature of the sites and viability challenges (more detail is provided in Section 3 and Appendix 1 of this report).

Currently, while the staff team at ECL is clearly adding value in bringing sites forward, the establishment of ECL as an entity is not adding value to the delivery of HRA schemes over and above that which could have been achieved through deploying the same resources as part of a directly delivered HRA development programme.



3 DEVELOPMENT PIPELINE

We have engaged with officers of ECL which has provided useful insight with respect to the current housing pipeline. The table provided at Appendix 1 provides a high-level overview of the sites which ECL is seeking to bring forward in line with company objectives. These sites are a combination of sites, which are currently held in the Housing Revenue Account (HRA), the General Fund and in third party ownership.

With the exception of Vaughan Road which appears to be progressing, all of the remaining sites comprise of predominantly constrained brownfield sites, public open space or comprise of sites which are not yet within the entire control and/or ownership of ECL.

It is evident from the anecdotal information provided that the sites are challenging, either as a result of abnormal costs associated with their development, for example; challenging topography, contamination due to previous uses or other known or potential constraints such as archaeological. As a result of these identified challenges and risks, the sites within the pipeline are either suffering from delays, are stalled or have been paused.

Development delivery is further exacerbated on several of the pipeline sites where vacant possession has yet to be secured and there are third party interests, for example, with respect to the Mary Arches Car Park and sites adjoining the Cathedral and Quay Car Park (Belle Isle Depot), on which infrastructure improvements would be required. . These issues add to the complexity of project delivery on already challenging sites in a difficult economic climate.

It is evident that these are not straightforward sites and the challenges now being encountered are affecting lead-in times, planning and development delivery timeframes, with a potential resultant increase in costs. These challenges are compounded further as construction costs continue to increase due to inflationary pressures on transport, materials, labour and finance. These factors may result in schemes ultimately proving financially unviable (without grant subsidy) and/or unable to come forward due to the high development costs relative to the anticipated income likely to be generated. Concurrently, in terms of securing a viable and sustainable business, the failure to deliver viable schemes results in delayed returns on investment through delayed sales receipts and rental income.

In addition to the current pipeline of sites, ECL is currently working on an additional 4/5 sites within the HRA with a view to taking them to Council Executive and Full Council in June and July 2023. Stage 1 reports have been completed and it is envisaged that these sites will contribute to new homes supply and the target number of 500 homes.

3.1 Pipeline site identification

With respect to the pipeline, we are informed that a gateway model is in place to manage risk exposure. This gateway process involves ECL considering development options in conjunction with architects and undertaking early feasibility design work at Gateway 1 prior to proceeding to the next stage, following sign off and the provision of quotes with subsequent Gateways thereafter.

With respect to site identification, we are advised that the initial 6-8 sites within the HRA, were readily identified by ECC as potential, viable opportunity sites, with ECL being

ECC's developer of choice. These included garage sites, although it is acknowledged that these proved to be challenging on financial viability grounds.

Additional sites for ECL which are outside the HRA and in the General Fund, are identified by ECL, but ECC does not appear to have an overall pipeline of sites for future development (either by ECL or others), and it is our view that the identification, development, and management of such a pipeline would be greatly helpful to the council in delivering its housing development objectives

These delivery constraints are set against the high-quality design aspirations and the objective to deliver to Passivhaus or Net Zero standards as the default position (unless instructed by the Shareholders on specific sites), which further increase development costs and adversely impact financial viability.

3.2 Development appraisals and viability

We heard that ECL does not utilise industry standard development appraisals such as ProDev or Argus, which are typically used by developers, local authorities and the construction industry. We also heard that development viability appraisals, when requested by ECC, are not forthcoming.

Development appraisals are an essential component of decision making and provide an indication of the viability of scheme proposals early in the development delivery process. These are refined at each stage as more due diligence is undertaken, but essentially provide an early estimate of the profitability of development, potential land receipt and / or need for gap funding subsidy to enable the proposals to come forward. In addition, they can inform the mix, type and tenures of homes that will ensure an optimum scheme is delivered in terms of balancing the need to meet housing needs and financial viability. They inform decisions in terms of what compromises may need to be considered or whether schemes should proceed at all to the next stage, with the associated additional investment required. Consequently, it is concerning that development appraisals are not being provided upon request for major scheme proposals which leads to a lack of transparency.

3.3 Brownfield Land Release Fund

Several sites have the benefit of BLRF which has been secured, however, this is time limited and schemes will either need to start on site, or land transferred to ECL in order to secure the funding. Failure to transfer the land or start works on site within timescales would risk clawback of the funding commitment. The proposal to consider disposal to ECL for minimal consideration, with overage provisions built in to recover value if planning consent eventually realises that value, is an approach that has been mooted. However, the risks involved would need to be carefully considered, not least due to the specific site challenges highlighted, how these are to be mitigated, and the potential for costs to increase further. Also, with respect to land transfer and determining best consideration, we understand that agreeing values ahead of scheme proposals being determined is a potential issue for ECC.

3.4 Summary on pipeline

It is expected that ECL schemes are intended to be viable, but it appears that the sites within the pipeline are challenging sites and experiencing deliverability challenges. In many instances the sites are reliant on some form of public sector subsidy, such as

secured BLRF, with future BLRF bids anticipated in order to unlock sites for development on eligible sites. In several instances, this funding is at risk.

The process for identifying sites suitable for the ECL pipeline appears to be slightly ad-hoc and reactive as opposed to having a robust and systemic approach in place for the development of a pipeline of sites, including site sifting and appraisal. This presents a potential underlying weakness in identifying viable sites for the ECL, particularly when considered in the context of high quality, passivhaus design and steeply escalating costs of construction and difficulties often encountered securing competitive tenders. This issue is a widespread issue in the UK and Local Partnerships is aware of many councils encountering this issue with some councils experiencing significantly increased tender prices between identification of a preferred contractor and contract close.

Local Partnerships has supported councils over the past 10 years to set up new vehicles, review performance and support improvement actions. We have learned that defining a committed pipeline of council land that gives a basis of a forward programme of investment, preferably for 3-5 years is essential but often difficult to achieve. A financial viability appraisal should be prepared using industry standard appraisal tool such as Argus Developer for the sites under consideration. This should involve an initial high-level analysis of development constraints, an indicative capacity layout plan, high level costings and market review.

The Council should review its development pipeline, identifying which sites should be included in a forward programme of investment over the medium term, taking into account viability and deliverability considerations.

We would also highlight that whilst necessary control mechanisms are needed, we have found from our research elsewhere that councils wish to have in place processes that can sometimes jar with the ambitions of wholly owned companies who benefit from having the freedom to deliver their Business Plan.

We would assert that generating profit in house building is a complex challenge which relies on rigorous cost control (at the level of individual components and packages of works) and a mature sub-contractor supply chain. Well-established house builders protect their profit margin by micro-managing these aspects of the development process for example by:

- national component buying teams who drive down prices to fractions of one penny and forward buy in bulk
- loyal sub-contractor networks who have often worked with the house builder for many years and where the builder is able to generate a pipeline of work for their specialist suppliers
- rigorous in-house processes and systems that monitor spend daily with managers called to account.

We have found elsewhere that other councils have underestimated the challenges of generating cross-subsidy profit and that it is not always possible for councils to exert the same levels of efficiency using the building contractor tender route.

Finally, we would highlight research undertaken by University College London (UCL) in 2017, 2019 and 2021 has traced the involvement of councils in the direct delivery of new homes. UCL found that in comparison with 2017 and 2019, the number of councils with companies, which may include housing companies and property companies of various forms and objectives, has increased from 58% in 2017, 78% in 2019 to 83% in 2021.



Within these figures, there is an amount of churn with council companies, opening, closing, and re-opening. UCL consider that this increase in the number of council companies may relate to the increasing use of JVs to deliver housing, and this has increased from 57% in 2019 to 72% in 2021.

This research¹ indicates that the number of new homes delivered by local authorities directly in 2021 (from all means, and of all tenures), being a total of 20,249 homes, which is considerably higher than the 8,992 homes reported in the 2018 survey (published in 2019).

Some key messages of relevance from this research are as follows:

- Almost half of new homes delivered by councils were full market value homes for sale or private rent, indicating that councils are aiming to utilise the cross-subsidy model of offsetting the cost of affordable units
- In all cases where direct delivery is progressing at pace, the council has identified a pipeline of multiple sites it owns which is forward committed to the programme
- Councils are adopting a more systematic approach to reviewing their land that could be made available for direct build in either the HRA, via a JV or in a wholly owned Local Housing Company
- The most frequently quoted reasons for not progressing with direct build are lack of suitable land and viability challenges
- The number of council companies that are based on a joint venture (JV) has increased from 57% in 2019 to 72% in 2021. Some councils like Oxford City Council, BCP and Brighton and Hove have multiple JVs
- JVs with Housing Associations were more common than JVs with developers and JVs with builders, even less common.

¹ https://www.ucl.ac.uk/bartlett/planning/sites/bartlett_planning/files/morphet_and_clifford_2021_-_local_authority_direct_delivery_of_housing_iii_report43.pdf

4 FINANCE

4.1 Financial overview

ECL was incorporated on 12th June 2018 and capitalised with a loan from ECC of £2.2m. This was the first of four loans that have been extended to the company, totalling £10.85m. The table below shows the value of each of those loans.

Table 3: Summary of loans

Loan number	Amount Approved (£'000s)	Approval	Purpose	Amount Drawdown (£'000s)
1	4,350	2018/19 business plan	Working capital	2,200
				2,150
2	5,000	2019/20 business plan	Barnfield Road site	5,000
3	15,640	Clifton Hill Opportunity Paper	Clifton Hill site	1,500
Total	24,990			10,850

ECL's potential income is drawn from four sources as follows:

1. Sale of new build residential units on the open market;
2. Sale of new build residential units to ECC's Housing Revenue Account (HRA);
3. Development consultancy services to ECC and other councils; and
4. Property management relating to six flats within the Guildhall shopping centre

It incurs the costs associated with developing and constructing new build units, albeit these are capitalised on the balance sheet as 'work-in-progress' (WIP) and not recorded as a cost in the company's profit and loss account until the associated sale income can be recognised i.e. when the sale has been legally completed with the buyer. For HRA units, the revenue can be recognised as the units are built out because the sales have been legally agreed with ECC in advance. For open market sales, the revenue for each unit can only be recognised once the unit is purchased which may not be until after it is built.

ECL does consultancy work for the council in terms of investigating the development viability of council owned sites and gets paid for that work. It has also done similar work for another Devon council i.e. Teignbridge District Council. ECL also performs a property management function on behalf of ECC for six flats that are part of the Guildhall shopping centre that the council owns.

As at 31 March 2023, which represented the fifth year end since the company's incorporation, the company had accumulated losses of £4.5m and utilised £9.3m of cash, leaving it with a balance of £1.5m.

The table overleaf sets out where this cash has been used.

Table 4: Summary of cash utilised



Use	Amount (£'000s)
Accumulated losses	4,527
Repayment of loans	754
WIP on the balance sheet	4,041
Total	9,321

The approach to capitalising the company has been unorthodox and if the company is to be retained it will need re-structuring to ensure it complies with local authority capital finance regulations as well as tax and subsidy control regulations. At present, long-term loans are being used to fund the working capital requirements in the company, which in turn are providing an income source back to the council via service level agreement arrangements for support services such as finance, legal and procurement.

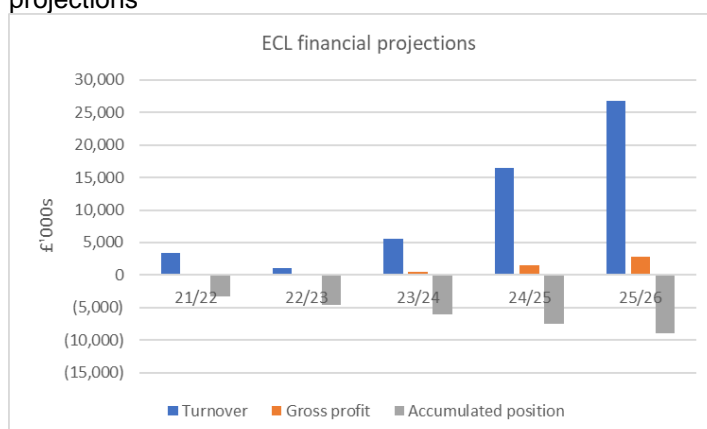
The funding structure of the company should mirror that which would be realistically achievable if the company was a stand-alone entity operating in the development market seeking funding from third parties. On that basis, the first loan of £4.35m should have been injected as equity with subsequent cash injected as development finance secured against the specific sites on which the cash was spent. The retrospective conversion of this loan to equity should be considered.

The latest financial statements for the company for the year ending 31 March 2023 show a loss-making company with net liabilities of £4.5m. In effect, ECL can only continue to operate with a commitment from the council that it will continue to underwrite ECL's losses by extending more capital to it. The caveat to this concern is that ECL does own a site, Clifton Hill, which was sold to it by ECC for a price significantly lower than its open market value. On this basis, the company may be able to realise sufficient cash to meet its debt obligations, but it would require a significant change in approach to the development strategy for Clifton Hill.

4.2 Reporting and alignment of financial performance

An annual business plan is prepared by ECL which projects a financial position over the subsequent three years. The graph below sets out the latest projections alongside the financial performance for the previous two years.

Graph 1: Financial projections



There are three key observations to highlight which are:



1. The expectation that development activity and sales will ramp up significantly during 2023/24 and the subsequent two years despite the on-going site, market and economic challenges.
2. The sufficiency of gross profit being earned from the turnover figures, averaging just over 9%.
3. As a corollary of above, the projected losses being accumulated by the company

Alongside the business plan, an updated profit and loss account and balance sheet are reviewed by the ECL Board at their bi-monthly meetings, and these are driven by a set of Excel spreadsheets which record actual income and expenditure. The budget projections for both are also updated periodically based on the latest status of the development pipeline.

It is clear that there is adequate oversight of the cash requirements of the business by the management of ECL and ECC. A gateway process is in place which requires the council’s shareholder representative to sign off at each key investment phase for each site with any expenditure of £500k and above requiring ECC approval.

The impact of ECL’s cash needs on ECC’s capital finance requirement is reported on an annual basis within ECC’s capital strategy which is approved by members as part of the annual budget setting cycle.

4.3 Key financial risks to ECC

There is both a budget and reputational risk facing ECC as a result of the current and projected financial position of ECL. The table below reflects the position in the graph above showing how the losses facing the company are expected to accumulate over the next three years.

Table 5: Accumulated losses

£'000s	23/24	24/25	25/26
Accumulated position	(6,026)	(7,521)	(8,934)

These are losses that are funded by ECC borrowing and which will need to be written off unless ECL can raise sufficient cash to repay the council. We have referenced the position with Clifton Hill above and it is clear that ECC recognises the critical juncture that it is at with the commissioning of this review. If ECC continues to extend finance to the company without a clear line of sight on how that will be repaid then it is clearly breaching Prudential Borrowing regulations by the fact that it is engaging in financing activity that is unaffordable. It is also contravening basic finance principles by borrowing long-term debt to finance day to day operating activity. As noted earlier, this activity is also underpinning income streams back into ECC for services provided to the company which, unless ECL becomes profitable is a questionable position because it is effectively converting an element of debt borrowed by the council into income for the council².

4.4 Short to medium term viability

We have commented elsewhere on the challenges facing the sites in the ECL development pipeline. The only way that ECL can become a viable development vehicle is if it can be confident of developing out a substantial number of sites at a significantly

² For the financial year ended 31 March 2023, the council charged the company £162k for finance, legal and planning services.

higher margin than currently projected. However, the conditions facing the development market in terms of supply chain costs and pressures, skill shortages, rising interest rates and softening housing prices would hinder this. ECL could re-orientate itself to solely focussing on delivering HRA sites and strategic development activity on certain council surplus sites to maximise disposal value. This is activity that could be undertaken within the council and would remove the overheads costs that come with operating in a company. The table below shows the breakdown of company expenditure classed as Administrative Expenses in the 2022/23 accounts.

Table 6: Summary of administrative expenditure

2022/23 spend	£'000
Seconded staff	385
Consultants	195
ECL staff	25
Staff training	12
Staff expenses	5
Subscriptions	7
Non-executive costs	30
IT	28
Office consumables	47
Marketing	21
Audit	12
Hospitality	5
Insurance	3
Sub-total	775
Payments to ECC for support services	162
Total	937

The total figure of £937k should be reduced by the value of services drawn from the council to fairly reflect what is addressable by way of savings and clearly elements such as audit fees and non-executive fees would be saved. A reduced scope and level of activity would also enable savings to be made in the other elements, albeit we are not able to quantify those.

4.5 Repayment of outstanding debt

The financial projections in the latest business plan clearly show that there is no likelihood of ECL being able to trade out of its loss-making position in the foreseeable future and that continuing to operate as currently configured will only exacerbate the situation. There has been £10.85m lent to the company. Taking into account the work undertaken by ECL in bringing sites forward, as well as the administrative expenses in Table 6 above, the remaining £1.5m represents the cash left in the company as shown overleaf.

Table 7: Summary of cash position

	£'000s
Cash borrowed	10,850
Cash spent	9,321
Remaining cash	1,529

Of the £4m of WIP on the balance sheet, £2m represents the Clifton Hill site and may have a disposal value significantly higher than this figure, though ultimate valuations are likely to depend on a review of the sale restrictions (such as those around the development of purpose built student accommodation on council land). We are not able to comment on whether the remaining £2m of WIP is realisable but this can only occur through sale of the developments on which it has been incurred, all of which, with the exception of Clifton Hill, are owned by ECC. The reality is that ECC could offset the WIP against its borrowing and may be able to realise sufficient value from Clifton Hill to cover the losses of £4.5m incurred to date but, as highlighted above, the potential headroom that may be offered by Clifton Hill needs determining and, irrespective of its scale, it is being diminished by the on-going day to day operating losses being incurred by the company.

The Council should commission a review and valuation of the Clifton Hill site with a view to understanding the financial implications of disposal options for the site, with a view to repayment of the debt owed from ECL to ECC.

4.6 Further financial support

The availability of finance is not an issue for ECL while ever it is owned by the council. We have noted the issues with respect to the current funding structure and how debt would need converting to equity to put it on a conventional, market footing. Certainly, CIL could not be used to fund the working capital needs of the vehicle and commercial property revenue would be at the expense of funding other council activity and therefore carry the same opportunity cost as the current finance approach.

Ultimately, the issue is that prevailing circumstances, many of which are beyond ECC's control, mean that ECL represents an expensive, high-risk delivery mechanism which ECC cannot afford to continue funding.

5 CONCLUSION

5.1 Future of ECL

As commissioned by ECC, we have considered the options for the future role for ECL, the delivery vehicle which was established by ECC in 2018.

We have considered this from a number of perspectives, including fit with strategic objectives, progress to date, the nature of the future development pipeline, and financial considerations.

It is very important to recognise that within a few months of the establishment of ECL, a key part of its rationale – development of affordable homes outside of the HRA ringfence – was no longer a reason for its existence, once the HRA borrowing cap was lifted. It is also important to recognise the major financial shocks which ECL has had to deal with since it was established, including Covid and the Ukraine War, and the severe inflationary pressures in the economy. These have made for an extremely challenging context within which any organisation, particularly a new entrant to the market, would have struggled to deliver new homes.

Furthermore, all of the feedback that we have received from interviewees has been positive about the skills and working styles of the ECL staff team.

Nevertheless, our central recommendation about the future of ECL is based on a number of factors which we observed in our review, including:

- The disappearance (with the removal of the HRA borrowing cap) of the main rationale for establishment of the company has not been replaced with a compelling justification for its retention.
- The original strategic objectives for ECL, while individually valid, are in unresolved tension with each other (for example developing unviable sites, to a high design standard, while delivering a financial return to the council). This has led to a lack of clarity for ECL. While this tension can only be resolved by ECC, these objectives could, in any event, be achieved through other operating models – such as a focus on an HRA development programme and an internal team within ECC with the ability to bring forward sites for development.
- To date, the only delivery of schemes which has been achieved has been on HRA land. Although there have been delays to some schemes, ECL staff have made these developments possible. However, these schemes could have been delivered as part of an HRA development programme and (on schemes such as Anthony Road), closer integration with HRA requirements from the outset would probably have delivered better outcomes.
- The barriers for delivery of the remaining pipeline, such as it is, appear at best very high, and quite possibly insurmountable. Development on brownfield sites in Exeter is challenging. To date, ECL have not been able to deliver these sites. There have been examples of insufficient coordination between ECC and ECL on these sites, for example around masterplanning exercises, picking up the costs for vacant possession, and submission of BLRF bids: some ECC officers to whom we spoke felt that bids had been submitted without ECC knowledge, though ECL do not accept this. Nor do ECL have any ‘easy wins’ within the pipeline, which could have enabled ECL to develop its approach and labour and supply chains.

Regardless of what happens to ECL, these sites will still be there, and will still need professional expertise and capacity to bring them forward, but it may well be that this is best done through other routes to market.


- Currently there is no plausible strategy for the repayment of the loans provided by ECC to ECL. ECL is currently making ever accumulating losses, while making repayments out of the capital sums loaned to ECL. Clearly this can not continue. Early actions, for example around disposal of land owned at Clifton Hill, will help to cover (or at least mitigate) the financial loss to ECC.
- There remain multiple high probability and high impact risks, which will be difficult for either ECC or ECL to manage. These include (but are not restricted to):
 - site specific risks around viability (see section 3 and Appendix 1)
 - inability to bring the business to scale quickly enough
 - the risk of default on the repayment of the loan from ECC to ECL
 - ongoing macroeconomic and inflationary pressures
 - uncertainty around the demand for the type of properties being developed by ECL (as at Anthony Road)

We recommend that ECC winds down operations of ECL, through a managed process which:

- **Transfers the current ECL staff team back to ECC, to form a delivery team which can bring forward the current ECL sites for development within the context of the ‘Liveable Exeter’ policy, and closer integration with the council and its priorities.**
- **Enables the council, through an independent valuation of the land in ECL ownership, to make arrangements for the disposal of sites for development in a way which will remove (or mitigate) financial losses to ECC arising from its loans to ECL.**
- **Develops a phased pipeline of sites (ideally to cover the next 3 – 5 years) which can realistically be brought forward to the market, based on accurate viability information.**
- **Takes into account the BLRF funding requirements, and for deliverable sites, makes a site by site assessment on how best it can meet those requirements through commencement of work on site or disposal.**

6 SUMMARY OF RECOMMENDATIONS

No.	Recommendation
1	<p>We recommend that ECC winds down operations of ECL, through a managed process which:</p> <ul style="list-style-type: none"> • Transfers the current ECL staff team back to ECC, to form a delivery team which can bring forward the current ECL sites for development within the context of the ‘Liveable Exeter’ policy, and closer integration with the council and its priorities. • Enables the council, through an independent valuation of the land in ECL ownership, to make arrangements for the disposal of sites for development in a way which will remove (or mitigate) financial losses to ECC arising from its loans to ECL. • Develops a phased pipeline of sites (ideally to cover the next 3 – 5 years) which can realistically be brought forward to the market, based on accurate viability information. • Takes into account the BLRF funding requirements, and for deliverable sites, makes a site by site assessment on how best it can meet those requirements through commencement of work on site or disposal.
2	<p>ECC should agree a refreshed, prioritised set of strategic objectives which it is trying to achieve through its interventions in the housing market.</p>
3	<p>Regardless of the future operating model for bringing sites forward for development the Council should prioritise the introduction of industry standard development software, to be used across both the Council and any delivery vehicles, which will enable it to assess viability of development.</p>
4	<p>The Council should review its development pipeline, identifying which sites should be included in a forward programme of investment over the medium term, taking into account viability and deliverability considerations.</p>
5	<p>The Council should commission a review and valuation of the Clifton Hill site with a view to understanding the financial implications of disposal options for the site, with a view to repayment of the debt owed from ECL to ECC.</p>
<p><i>The following recommendations would only apply if the Council decided to retain ECL in its current form:</i></p>	
6	<p>Should ECC decide to retain ECL, it should consider the establishment of a members Shareholder Committee in order to enable more transparent scrutiny of ECL. Terms of reference could include:</p> <ul style="list-style-type: none"> • Oversight of decisions requiring approval by the Council, such as business plan approval • A mechanism to communicate the shareholder’s views to ECL



No.	Recommendation
	<ul style="list-style-type: none"><li data-bbox="328 264 1270 360">• A means to evaluate the effectiveness of the ECL board and the delivery of performance against strategic objectives and the business plan<li data-bbox="328 398 1270 465">• An articulation of what success looks like in terms of achieving social/ economic outcomes and/or financial performance<li data-bbox="328 504 1270 533">• A holistic review of risk to the council offered by ECL activities
7	Should ECL continue to deliver work on behalf of the HRA, the Council should request that it introduces a form of time recording system for work undertaken for the HRA, to enable it to ensure appropriate levels of charging to the HRA, and assess value for money.

Appendix 1

Site	Description	Site Issues/Risks
Vaughan Road	Former tower block site (now cleared) held within the HRA located within a wider estate regeneration area. Being delivered in three phases to enable mid-sized contractors to tender for the phase scheme. Considering densification of site via later phase development which would replace older bungalows. Looking to bid into BRLF. Will deliver 80-120 houses on vacant site.	Contractor secured for first phase and development is progressing. ECL plans to include phases 2 and 3 within the current work package, which is subject to Full Council approval. All phases are due to complete by December 2024.
Clifton Hill	Site of former leisure centre with planning permission for 42 units. This is a challenging site with level changes impacting on development costs. Following a failed procurement and contractor supply chain issues, the site has been put to a separate contractor to examine alternative design/engineering solutions and identify associated cost savings, including simplified unit types.	Stalled site. Delivering a viable scheme may remain a challenge in the absence of gap funding.
Mary Arches Car Park	This site is allocated in Local Plan. BLRF bid is submitted and proposals are currently at RIBA Stage 1/feasibility stage. Development would contribute to Liveable Exeter ambitions. There are two halves to the scheme proposals. Phase 1 relates to the MSCP site with a concept plan for 100 build to rent homes to be held by either ECL or PropCo.	<p>Scheme requires the securing of vacant possession of two ground floor units , however, in relation to one unit, there is the potential need to effect CPO powers which, if required, will impact on the timing of delivery and will incur additional costs.</p> <p>BLRF has been secured for the demolition works and in line with funding conditions the development will need to start/or land transferred by 31 March 2024.</p> <p>Archaeological digs will be required which is a potential risk to this subsequent phase of development in terms of delays and costs. ECL propose they negotiate disposal with the City Surveyor and then pay</p>



Site	Description	Site Issues/Risks
		Best Consideration when the option is exercised. (determined via an independent valuation). This is to preserve BLRF funding
Exeter Canal Basin	Exeter Canal Basin is held within the General Fund. ECL is in the process of assembling scheme proposals with a view to submit for planning in June 2023. Capacity for 37 units including four duplexes and apartments (3 and 4 storey). ECL is to provide the results of their options analysis to inform ECC decision making. Aspirations are for the scheme to retain the Exeter Watersports centre and contribute towards net zero targets.	Viability is a potential risk and is to be determined in conjunction with the options analysis and a land value/land receipt confirmed. There are issues related to securing vacant possession of existing buildings
Bonhay Meadow	Bonhay Meadow is held in the General Fund. This is an area of open space which is council owned. Set in Liveable Exeter Strategy this area is seen as a significant regeneration area.	Proposals are paused. We are advised that this is a sensitive site, due to some resistance to development from planning and political sensitivities regarding building on open space. There are also some concerns which have been flagged from the Environment Agency. BLRF has been secured but is at risk with transfer of land or start on site by 31 March 2024 a funding requirement. ECL proposing land be transferred to ECL and leased back to ECC to protect the BLRF. However, this is a risky strategy as it is possible that the site remains undeliverable in view of the issues highlighted.
Cathedral & Quay Car Park	The site is held in the General Fund. Council car park with structural issues. Need to look at the options for delivering this site. Workstage 2 end of this month. Capacity for 31 units. Potential for off-site affordable housing and 100% market sale onsite.	Project has been paused. Key risks associated with development include: £2m BRLF which is at risk. Need to transfer land or start on site by March 31 st .
Belle Isle Depot	Site in council ownership (still operational depot). Site has	£0.637m BLRF secured. Project dependencies linked to need to secure



Site	Description	Site Issues/Risks
	<p>capacity for 32 units, and is intended to deliver family homes/apartments for sale, to a Passivhaus or Net Zero standard, and Improve the national cycle route experience.</p>	<p>alternative premises for the depot, and vacant possession of the existing depot which remains operational, and development viability. Significant contamination is likely.</p>
<p>Glasshouse Lane</p>	<p>This site is in third party ownership. Open space/park situated within a council estate area . Restrictive Covenant associated with use as Church. Review of open space – planners indicate this is not needed. Capacity for 24 affordable units.</p>	<p>The site is outside ECC and ECL control.</p> <p>Securing planning is a risk. Community resistance is anticipated due to previously poorly managed private sector housing development in the area.</p> <p>In order for planning to prove successful it has been indicated that this will need to be an exemplar scheme which may impact on development costs and development viability. This needs to be examined.</p>

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ECL Activity & Achievements:

Summary

Exeter City Group Ltd was set up with subsidiaries to develop, hold, maintain and manage properties for the open market, affordable homes for rented and shared ownership purposes and other commercial, leisure or retail property, if deemed in the best interests of Exeter City Council (ECC). Exeter City Living Ltd (ECL) has been the only active company in the Group with its primary role to develop housing of all tenures on ECC land.

Over the past 4 years, ECL has done this by carrying out feasibility studies on numerous ECC land holdings seeking to maximise delivery of housing from brownfield City Centre sites. In doing so, ECL has sought to support ECC by setting high standards for brownfield development in the city to help mitigate the impacts of the Climate Emergency and create places that enhance the living environment for Exeter people.

Whilst doing this ECL has secured £7.4m of government funding at the earliest possible stage to help with abnormal construction costs for the planned developments.

The company has completed 3 sites providing 22 homes and has two developments under construction which will provide 56 homes by the end of 2024. Future phases on one of these sites can provide a further 56 homes with construction continuing without further procurement or delay, subject to viability and instruction from the HRA.

A further site to provide 41 homes is cleared and ready to start construction when economic conditions improve.

There are a further 3 sites (92 homes) that are ready to submit planning applications and one further site (100 homes) progressing through the detailed feasibility stage.

ECL has provided the Housing Revenue Account (HRA) with initial feasibility reports for a further 5 sites along with reviewing numerous other HRA land holdings to establish which sites have the greatest development potential.

Feasibility work has also established the technical requirements or limitations for other significant ECC land holdings, leading to development opportunities or disposals to third parties.

ECL has been developing its pipeline during a long and significantly challenging period for delivery within the construction industry - dealing with exceptional cost inflation, material shortages and supply chain uncertainty. This has been further challenged by the complexity of the sites it was tasked with developing. ECL's balance sheet does not reflect the potential increase in value of ECC's sites nor reflects the work it has carried out evaluating sites all of which has been serviced by debt funding alone. However, ECL continues to provide benefits to ECC that have totalled circa £4m to date through loan interest payments, Land and CIL payments, office rental income, and contribution to ECC staff costs. Work carried out by ECL has also reduced the necessity of development staff in other ECC teams as well as being able to hold and administer the Guildhall Flats for a nominal fee.

Completed Developments:

Site feasibility, planning and construction to completion:

- 3 new 3 Bed Passivhaus Homes at Anthony Road.
 - Sold at cost to the Housing Revenue Account (HRA) due to the market disruption and uncertainty with the COVID-19 pandemic.
- 9 new 3 bed Passivhaus Homes at Thornpark Rise (Hockings Green)
 - Sold at cost to the HRA due to the Pandemic.
- 10 new 3 bed Passivhaus homes at Bovemoors Lane on behalf of the HRA

Developments under construction:

Site feasibility, planning and construction to completion:

- 21 new Passivhaus Apartments at Hamlin Gardens for the HRA – due for completion in March 2024
- 35 new Passivhaus Affordable Apartments at The Gardens Whipton, Vaughan Road, which is the first phase of 91 new homes for the HRA. Phase 1 is due for completion in December 2024, with the remaining phases subject to instruction from the HRA. Planning was successfully secured without S106 Affordable homes requirement to maximise the ability to secure Homes England Grant. Procurement of the main contractor was achieved using innovative methods to facilitate appointment of contractor in the current challenging construction market. The next two phases of the project have the option to continue providing viability is achieved. Instructions to continue with groundworks on the next phase have already been received.
- 41 new Passivhaus Homes at Clifton Hill. Planning, Land acquisition (£2.14m capital receipt for ECC) and £425k LRF funding secured and used for demolition of redundant buildings and site secured. The site is currently on hold due to viability constraints following construction cost increases. Potential for the site to be delivered with further procurement exercise being explored.

Sites working through Development Stage ready for Planning Applications to be submitted:

- 31 new homes at Belle Isle.
- 37 new homes & EWSA facilities at Exeter Canal Basin, Haven Road
- 24 new Affordable homes at Glasshouse Lane, including two wheelchair-accessible units. Land secured via Option Agreement with Plymouth Diocese.

Sites Working through Development Feasibility Stage:

- 70-100 new homes at Mary Arches Car Park.

Feasibility Studies carried out for ECC owned potential development sites – sites not progressing:

- Pyramids
- Exeter Arena Park
- Bonhay Meadows
- Cathedral & Quay Car Park
- Magdalene Road Car Park
- Non ECC owned sites:
 - Smythen Street Car Park & Angling Centre (handed over to ECC Estates)
 - EGCC Topsham – 2nd highest Land Bid
 - Barnfield Road
 - JV with Acorn at St Leonard Quarter
 - Potential city centre accommodation above commercial – 11 properties

Initial Site Feasibility Studies for potential HRA sites:

- Vaughan Road Phase 3 & 4 (Rennes Tower)
- Lower Wear Road
- Chestnut Avenue
- Clifford Close
- Taunton Close
- Initial evaluation of 6 low potential sites
- Review of Building-Up potential – 2 storey options above existing apartment blocks.

Miscellaneous Projects:

- Secured £7.4m of OPE LRF/BLRF funding for ECC owned sites.
- Assisted ECC in progressing Garden Communities (Liveable Exeter) delivery plan.
- Manage feasibility study for new Health & Wellbeing Centre at Wonford - ongoing.
- Manage feasibility study for potential new Columbarium (completed but unviable).
- Project Management for the replacement Depot for Belle Isle (initial new location not viable).
- Initial consultancy work for Teignbridge District Council has been positively received and they are seeking to appoint ECL to undertake further work as well as examining the potential for ECC/ECL to manage Build to Rent Homes on their behalf.
- ECL is used to hold and administer for a nominal sum the 6 apartments acquired as part of the Guildhall Shopping Centre acquisition for ECC.
- Office refurbishment has been completed with exception of the kitchenette area.
- Independent IT system set-up to allow sharing of data with consultants.
- Developed in house development appraisal financial model.
- Business Case for Residential Property Company including financial model.

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REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

REPORT TO COUNCIL

Date of Meeting: 17 October 2023

Report of: Director Finance

Title: Consultation of the local Council Tax Support Scheme for 2024-25

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

This report seeks members' agreement to carry out consultation on a proposed change to the local Council Tax Support Scheme for working age for 2024-25. The proposed change being to create a class of support within the scheme to award 100% council tax support to care leavers looked after by Devon County Council, up to age 25.

2. Recommendations:

That Executive RECOMMENDS to Council that agreement be given to carry out public consultation on the proposed change to the local Council Tax Support Scheme for working age for 2024-25 to introduce a class within the scheme to award 100% council tax support to care leavers looked after by Devon County Council, up to age 25.

3. Reasons for the recommendation:

3.1 Executive agreed at the meeting of 5 September 2023 to recommend to Council that agreement in principle be given for a council tax exemption for care leavers up to the age of 25 and looked after by Devon County Council, subject to a further report setting out all the implications including the financial impact on Exeter City Council.

3.2 This report sets out the options for achieving a council tax exemption and potential financial impact on Exeter City Council and highlights from a funding perspective why the Council may prefer to award this support through the local working age council tax support scheme.

3.3 Each year the Council is required to review and agree the working age council tax support scheme by 11 March of the preceding financial year. Any changes to the scheme are subject to public consultation.

4. What are the resource implications including non financial resources

4.1 Because, in England, care leavers are not exempt in legislation from paying council tax, to be able to exempt care leavers from paying council tax the Council needs to utilise either its' discretionary powers under Section 13A (1) (c) of the Local Government Finance Act 1992 (as amended) or create a class of support within its' local Council Tax Support Scheme for working age.

4.2 Section 13A (1) (c) of the Local Government Finance Act 1992 (as amended) gives the Council discretionary powers to reduce the amount of Council Tax payable by an individual.

4.3 Devon County Council has confirmed that there are 161 care leavers aged 18 – 24 living in Exeter. Our records show that 50 have a council tax liability. Of those 50, 35 are currently getting council tax support (CTS) up to a maximum of 80% of their liability, 12 are not getting any council tax support and 3 already qualify for a council tax exemption so have nothing to pay.

4.4 So if awards were to be made under S13A (1) (c) after national discounts and after any entitlement to council tax support had been applied, then this would cost £24,836 per annum. Making awards under S13A (1) (c) is a general fund expense and so met solely by Exeter City Council.

4.5 If a class of support for care leavers is created within the Council's local Council Tax Scheme for working age however, that annual cost of £24,836 would be shared between preceptors as follows:

Preceptor	%	
Devon County Council	75.38%	£18,721
Exeter City Council	8.08%	£2,007
Police & Crime Commissioner for Devon & Cornwall	12.07%	£2,998
Devon & Somerset Fire & Rescue Authority	4.47%	£1,110

5. Section 151 Officer comments:

5.1 Officers have been working to introduce a support for Care Leavers across Devon. The proposed scheme will allow the costs to be shared in line with the Council Tax take from each Preceptor. The potential costs of the scheme if all were to fall on Exeter would be around £25,000. However, to implement that discount would be extremely resource intensive causing challenges for the team. The cost before Council Tax Support is applied would be in the region of £60,000 a year and would require appropriate reductions. Implementing the scheme as proposed brings the costs down to a more manageable £2,000 a year.

6. What are the legal aspects?

6.1 The relevant legislation enabling the Council to introduce a class of support into its' Council Tax Support Scheme is set out in Section 13A (2) (b) of the Local Government Finance Act 1992, as amended by the Local Government Finance Act 2012, and states the following:

(2) Each billing authority in England must make a scheme specifying the reductions which are to apply to amounts of council tax payable, in respect of dwellings situation in its area, by-

(b) persons in classes consisting of persons whom the authority considers to be, in general, in financial need.

6.2 In year scheme revisions are not allowed.

6.3 Authorities need to comply with the public sector equality duty in section 149 of the Equality Act 2010 when setting up or changing a local scheme.

6.4 The vulnerable must be protected (being mindful of the Child Poverty Act 2010, the Disabled Persons Act 1986, the Chronically Sick and Disabled Persons Act 1970 and the Housing Act 1996).

6.5 Authorities are required to consult on the scheme with the major precepting authorities before a scheme is designed, and to then consult with the public and other agents once the scheme has been established.

6.6 All local authorities must have a robust scheme as the whole scheme could be open to challenge.

6.7 Where consultation is carried out, it needs to be carried out properly and genuine consideration given to the responses.

7. Monitoring Officer's comments:

This report raises no issues for the Monitoring Officer.

8. Report details:

8.1 There is an ambition between Devon County Council and the district authorities to achieve a council tax exemption for care leavers looked after by Devon County Council up to their 25th birthday.

8.2 Care leavers face the challenge of having to cope with the demands of living on their own at a young age including having to maintain a home and manage finances, without support from family, and in Exeter they are a particularly vulnerable group for Council Tax debt. Discussions have been ongoing about how to financially support care leavers whilst they develop independent lives and life skills.

8.3 Section 13A (1) (c) of the Local Government Finance Act 1992 gives the Council discretionary powers to reduce the amount of Council Tax payable by an individual, however when utilising those powers, any cost incurred has to be met solely by the Council.

8.4 Section 13A (2) (b) of the Local Government Finance Act 1992 relates to an authority's council tax reduction scheme, known in Exeter as the Council Tax Support Scheme, and gives the Council the ability to state within their local scheme the reduction that applies to persons in classes consisting of persons whom the authority considers to be, in general, in financial need. Therefore if the Council considers care leavers to be a class, in general, in financial need, then the Council can specify within their scheme the

level of support that will apply. As Council Tax Support is funded through the Council Tax Base, the costs are shared in proportion with the amount the preceptors receive. The proportions are as follows:

Preceptor	%
Devon County Council	75.38%
Exeter City Council	8.08%
Police & Crime Commissioner for Devon & Cornwall	12.07%
Devon & Somerset Fire & Rescue Authority	4.47%

8.5 Council Tax Support (CTS) was introduced from 1 April 2013. It is a means-tested reduction for council tax payers who are on low incomes. It replaced the previous national Council Tax Benefit Scheme. For working age applicants the scheme is determined by local policy and for pension age applicants it is a national scheme subject to prescribed legislation.

8.6 Potential timetable for implementation, if agreed:

Write to preceptors	4 October 2023
Council meeting	17 October 2023
Public consultation start date	19 October 2023
Public consultation closure date (6 weeks later)	30 November 2023
Executive meeting	6 February 2024
Final scheme to be adopted by Full Council on	20 February 2024
Implementation start date	1 April 2024

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

This decision will contribute to the aspirations of the Exeter Vision 2040.

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

There are no perceived risks with this request as it is only to consult on a proposed change.

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 proposal to award 100% council tax support is recommended to advance equality by removing disadvantage. The national statutory guidance on the application of the corporate parenting principles states that there are unique challenges that looked-after children and care leavers face. 60% of children become looked-after due to abuse or neglect and they have poorer educational and health outcomes than their peers. It further states that application of the principles is intended to ensure that all councils respond to the individual needs, vulnerabilities or disadvantages of looked after children and care leavers as this will assist in securing that such children and young people are not placed at significant disadvantage when compared with the support a non-looked after child or young person may receive from their family.

11.5 As this report is only seeking members' agreement to carry out consultation on a proposed change to the local Council Tax Support Scheme for working age for 2024-25 an equality impact assessment is not included. Members will then have the opportunity to consider the outcome of the consultation together with consideration of the equality impact assessment before agreeing the final scheme.

12. Carbon Footprint (Environmental) Implications:

No direct carbon/environmental impacts arising from the recommendations.

13. Are there any other options?

Alternatively Members can agree to support to care leavers via their discretionary powers. Based on current data, this would cost the council £24,836 per annum.

Director Finance, David Hodgson

Author: Laura Fricker, Service Lead Revenues, Benefits & Customer Access

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

Background papers used in compiling this report:-

None

Contact for enquires:
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REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

Report of: Director City Development

Title: Exeter Plan: Full Draft Plan 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 Exeter Plan (Local Plan) and seeks approval for public consultation on a Full Draft of the plan. This would be the third public consultation on the Exeter Plan.

2. Recommendations:

2.1 That the Executive approves the Full Draft Exeter Plan (included in Appendix A) as the basis for public consultation commencing on 23 October 2023;

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 Full Draft Plan content before it is published for consultation; and

2.3 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 a change to the consultation start date if required.

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 2022, the City Council held a public consultation on an Outline Draft Plan. This included the vision for the city, a framework of planning policies and a series of potential development sites for consideration. Since this consultation, the consultation responses have been analysed and reported back to Executive and they have been used to inform the Full Draft plan. Further evidence has also been compiled to support the Plan.

3.3 The Full Draft plan (Appendix A) takes the plan process a step further from the outline draft and provides a draft of the full set of planning policies proposed for Exeter. It also

includes a set of site allocation policies to steer high quality large scale, brownfield development.

3.4 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 further towards a final 'Publication Draft Plan' for further consultation in 2024. The consultation will fulfil statutory requirements, will be in accordance with the adopted Statement of Community Involvement and will follow the Consultation Charter.

3.5 The timing of the proposed consultation accords with the timetable for preparing the Exeter Plan. This was included in the Local Development Scheme which was approved by Executive in June 2023. The Local Development Scheme identified the need for consultation on the plan in October 2023.

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 arising from 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 a 'Full 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 (2021) and 'Outline Draft' consultation (2022) were also held to meet the requirements of Regulation 18, however it is considered important to give the community a further opportunity to influence the plan, again in accordance with Regulation 18.

7. Monitoring Officer's comments:

7.1 The Monitoring officer supports the recommendations set out in this report.

8. Report details:

Background

8.1 Since the Outline Draft Plan consultation was held between September and December 2022, further work has been undertaken to progress the Exeter Plan. This work has focused on reviewing the responses to the previous consultation, the production of various studies as part of the evidence base, further assessment of potential development sites and the drafting of the plan content itself.

Summary of the Full Draft Plan content

8.2 The key material for consultation is the Full Draft Plan document as per Appendix A. This will be supported by the evolving evidence-base for the plan, some of which was available for consultation in autumn 2022 with the Outline Draft.

8.3 The Full Draft Plan includes:

- Exeter's Vision 2040. This was included in the Outline Draft Plan and has been widely adopted by organisations in the city;
- The spatial strategy setting out the pattern and high level characteristics of development. This has been reviewed following consultation in 2022;
- A full set of thematic planning policies. This work builds on the initial policies which were consulted on in 2022; and
- A revised list of potential development sites (mixed use, residential and employment) and six allocation policies for strategic brownfield sites.

This content builds on the framework which was provided by the Outline Draft Plan in 2022.

8.4 The Exeter Plan continues to be anchored by Liveable Exeter, the principles of which are included in draft policy. These principles have been extended with the addition of a seventh principle covering cultural activity. The proposed spatial strategy included for consultation retains the vast majority of the content of the strategy which was consulted on previously, particularly the emphasis on brownfield development, the focus on net zero and the need to meet development needs. Further strands have been added however, including reference to the importance of access to local services, the need to conserve and enhance the historic environment and the role which culture can play in driving regeneration.

8.5 A series of 24 mixed use and residential site allocations have been included for consultation. The vast majority of these are brownfield. The number of residential site allocations proposed is slightly fewer than the 28 at Outline Draft stage because various sites previously consulted on have since been permitted. There is still a focus on the large scale brownfield sites which were included in the Liveable Exeter initiative although only 6 of the original eight are now considered through the plan process; West Gate (around Exe Bridges) and Sandy Gate (around Sowton and junction 30 of the M5) have been omitted at this stage as a result of delivery constraints, although they do remain long-term aspirations as part of Liveable Exeter for potential delivery outside the plan period. The boundaries of the some of the sites have also been revised following further consideration. Six specific site allocation policies are included for these large scale, brownfield developments.

8.6 A list of four new employment allocations have also been included. Sites at St Luke's university campus, Toby Carvery at Middlemoor and sites at Newcourt are proposed. The Outline Draft Plan did not include any employment sites. Following commentary on this matter at the previous consultation it is considered appropriate to positively allocate sites for employment uses.

8.7 The consultation will also invite respondents to suggest additional potential development sites for future assessment and consideration through the plan-making process. This 'call for sites' process is an important part of plan-evidence and follows the previous process which was held in 2020.

8.8 Finally, a suite of approximately 60 thematic policies have been prepared. This compares to the 28 which were included in the Outline Draft Plan. The policy themes/chapters remain consistent as those consulted on previously but significantly more detail has been added, particularly in relation to housing, employment, climate change and the natural environment.

8.9 A number of evidence base documents have been prepared in support of the Exeter Plan. This includes a Sustainability Appraisal and a Habitats Regulation Assessment. These documents, and the wider evidence base, will be made available for comment during the consultation.

Consultation format

8.10 The consultation on the Outline Draft plan was organised so there was significant digital presence, particularly through the new Commonplace online platform, while 15 public exhibitions were held across the city. Significant efforts were made to raise the profile of the consultation which resulted in around 1500 respondents and more than 1000 people attending the events.

8.11 A similar approach will be used for the consultation planned this autumn; Commonplace will be used again and a number of events will be held across the city. Again, widespread advertisement will be used to promote the consultation.

8.12 The length of the consultation will be 12 weeks, twice the 6 week statutory requirement. The consultation will be undertaken in accordance with the City Council's Statement of Community Involvement and Consultation Charter.

Other planning policy consultations

8.13 There will be a number of consultations on planning policy running during the autumn. In addition to the Exeter Plan, the Water Lane Design Code and Householder's Guide: Design of Extensions and Alterations (a Supplementary Planning Document) will be subject to public consultation. Because these will be Supplementary Documents, there is a less stringent set of consultation requirements and therefore consultation periods will be shorter. All three consultations will however start on the same date in late October. The synergies between the subject matter of all the documents means it is appropriate to run the consultations together. There will also be a separate consultation specific to the potential aspirations for the South Gate site later in 2023, although this will be separate to the plan-making process.

Next steps

8.14 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. This future 'Regulation 19' stage will be the final Draft of the Plan – the Publication version. Public consultation on this will be held in 2024.

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

9.1 The Full Draft of the Exeter Plan specifically explains, in each chapter, how the plan will deliver on the priorities of the Corporate Plan and there is close alignment between the two documents.

9.2 The Full Draft Exeter Plan consultation will be important in ensuring the delivery of all of the City Council's Corporate Plan priorities:

- Prosperous local economy;
- Healthy and active city;
- Housing and building great neighbourhoods and communities;
- Net zero carbon city; and
- Thriving culture and heritage.

9.3 The Exeter Plan also links with, and helps to support, other key initiatives such Live and Move, the Exeter Transport Strategy and our net zero plan amongst others.

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 Full Draft Plan meet the requirements of current planning legislation for the 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 and the speed at which plans need to be progressed. As the details of the Bill continue to emerge they will be taken into consideration in the emerging plan to ensure it accords with the prevailing legislation of the time – changes to plan-making procedures could be implemented in 2026. Irrespective, 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 An Equalities Impact Assessment has been undertaken. In recommending the Full 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.

11.5 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.

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 Full Draft Exeter Plan. However, the digital consultation methods will minimise the carbon footprint associated with holding the consultation. In addition, the Full Draft of the Exeter Plan has a key focus on climate change.

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 and provide the public and stakeholders with an opportunity to comment on a Full Draft of the Exeter Plan in advance of the Publication Draft – in essence the final draft. 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'.
Exeter Plan Outline Draft Plan.
Exeter Plan: Outline Draft Plan Consultation Report.

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The Exeter Plan

This is our city • This is our future



Full Draft Plan
October 2023

EXECUTIVE VERSION – APPENDIX A

The Exeter Plan
Full Draft

October 2023

Foreword

Work continues on the Exeter Plan – the blueprint for the future of the city. We now have a Full Draft Plan to share with our communities, businesses and stakeholders. For the first time, this document brings together our key objectives, a full set of planning policies and proposed development areas for comment.

This Full Draft Plan includes the planning policies we need to deliver our key priorities:

- A prosperous local economy;
- A healthy and active city;
- Housing and building great neighbourhoods and communities;
- A net zero carbon city; and
- Thriving culture and heritage.

It also sets out the six key, brownfield sites which will provide the majority of the high quality development we need in sustainable locations. Water Lane, a key flagship proposal alongside the canal, is a great example of how we can use the past to create great new places to live, work and spend our leisure time. Development opportunities like this provide great optimism for how the city will evolve in the coming years.

I look forward once again to hearing from the communities in Exeter as we look forward to a bright future in the city.

Councillor Phil Bialyk
Leader - Exeter City Council

Progressing the Exeter Plan

This consultation is the third opportunity for you to comment on the Exeter Plan.

We started work in 2020 and in the September of 2021 held a consultation on an 'Issues' document which launched the plan. In the autumn of 2022 we invited comments on an Outline Draft Plan which included a framework of policies and draft development sites. This autumn, for the first time, we are consulting on a Full Draft of the Exeter Plan. This provides a full set of proposed planning policies and more detailed information on our key, high quality, brownfield development sites which will be the vital building blocks for the future of Exeter.

During our last consultation in the autumn of 2022 I was delighted with the level of interest from the city community. Nearly 1500 people, organisations and companies responded and more than 1000 people visited the exhibitions across the city. The interest shown has been vital in shaping this next version of the plan and so I thank you for getting involved.

Over the coming months you have the opportunity to continue shaping the plan and the future of your city by taking part in our latest consultation. We will be reaching out to our communities in person and online to widen the interest in the plan and to provide the information you need to get involved. Your input really makes a difference and so we look forward to hearing your views on the evolution of our beautiful city.

Councillor Emma Morse
Portfolio Holder, City Development – Exeter City Council

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1 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. Once adopted, 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 prepare the Exeter Plan. The plan 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. A further round of consultation was then held on an Outline Draft plan in late 2022, which presented a series of strategic planning policies and site allocations. We have used these two rounds of feedback to inform the current Full Draft Plan.

What is the Full Draft of the Exeter Plan?

- 1.4 The Exeter Plan is continuing to take shape and the Full Draft is the second version of this plan. It builds on the framework included in the previous Outline Draft and includes the vision for the city, a full set of planning policies to steer planning applications and potential development sites for a mixture of uses including housing and employment. It also includes a proposals map, which shows the extent of spatial designations and proposals contained within the Plan.
- 1.5 The full draft plan includes a large number of policies covering different topics, together with site allocation policies. Where the policies are vital to the delivery of the spatial strategy, key development and infrastructure proposals and are associated with cross-boundary matters, the policies are identified as 'strategic policies'. Where policies cover more detailed matters these are considered to be non-strategic. Neighbourhood Plans can also include non-strategic policies. The differentiation between strategic and non-strategic policies is a requirement of national planning policy.
- 1.6 It should be noted that at this stage a viability appraisal has not been completed for the plan. This means that the content of the policies are subject to change to ensure development viability as is required by national planning policy.

What happens next?

- 1.7 We will hold this consultation between 23 October and 15 January 2024 and would like as many responses as possible. The responses will be used to inform a final draft document, which will be published for comment in 2024 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 likely to take place in 2025.

2 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.
- 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 new homes in the city in high quality developments and 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. These principles are included in this plan.
- 2.8 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.
- 2.9 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.

- 2.10 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

- 2.11 The Exeter 2040 vision will be delivered in different ways using a range of innovative tools including the Exeter Plan. However, there are other mechanisms which are being used to deliver high quality development in the city.
- 2.12 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 the city.
- 2.13 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.
- 2.14 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 the refreshed Corporate Plan, and the strategies of key institutions and partners, will also play a vital role. This is shown at the start of each chapter of the Exeter Plan by an explanation of how the plan will support the City Council's corporate priorities.
- 2.15 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 and new Local Transport Plan.
 - Heart of the South West Local Industrial Strategy
 - Exeter Civic University agreement and the University 2030 Strategy
 - Exeter College Strategic Plan 2020 - 2025
- 2.16 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, the Environment Agency, Natural England, National Highways, Historic England) 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.
- 2.17 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 is not a formal planning document but will draw together the proposals in the individual Local Plans (including the Exeter Plan) to show the overall picture on key strategic topics affecting the area as a whole.

- 2.18 As well as planning for change over the next 20 years through the Exeter Plan, development may come forward through innovative approaches using a variety of models. The City Council will work with partners to explore new delivery mechanisms to support high quality development and infrastructure delivery.

3 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. It plans for the city's growth recognising Exeter as a 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 previous consultations.
- 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 on the edge of the city.
- 3.4 Following consultation on the Outline Draft Plan in 2022 we have looked again at this spatial strategy so that it reflects Exeter's Vision 2040 and the City Council's priorities set out in the refreshed Corporate Plan. The main change from the current strategy in the adopted Core Strategy is to move away 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.
- 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. Since the Outline Draft Plan stage, the number of greenfield sites proposed for development in the plan has reduced.
- 3.7 Another key part of the strategy that our brownfield approach supports is to ensure that residents have walkable access to services and facilities. The basic premise is to develop neighbourhoods where daily services can be accessed easily on foot; this will play a role in minimising carbon emissions, improving health and wellbeing and enhancing access to services.

- 3.8 The City Council has recently undertaken some analysis across Exeter looking at the current level of provision of some of the key services and facilities. This work has helped us to understand where there are gaps in provision to inform the content of the plan. In future, this work could also be used by applicants and the public to better understand the level of provision in their local area.
- 3.9 The spatial strategy is included in policy S1. The development allocations included elsewhere in the Exeter Plan have been guided by the spatial strategy.

S1: Spatial strategy (Strategic policy)

The spatial strategy will deliver on Exeter's Vision 2040 including the city's ambitions for net zero, health and wellbeing, the vitality of the city centre and cultural diversity. The City Council will work with partner Authorities and other stakeholders to deliver these ambitions.

The spatial strategy for delivering development in Exeter has 14 elements:

1. Providing good quality homes of a variety of types in the city to meet Exeter's needs.
2. Bringing forward new forms of employment provision in the city, developing the transformational sectors and supporting improvements to education and skills to ensure employment needs are met.
3. Focusing the majority of development on strategic brownfield sites, particularly in locations close to the city centre, district centres, local centres and key public transport hubs, to deliver high quality places.
4. Enabling the development of smaller brownfield sites as they become available.
5. Considering modest greenfield development as a supplement to the overall focus on brownfield sites.
6. Locating development near enough to key services and facilities to allow residents to meet most of their daily needs on foot.
7. Protecting the landscape value of the sensitive hills which provide the vital setting of the city.
8. Protecting the ecological value of the River Exe, its estuary and wildlife networks.
9. Conserving, enhancing and improving access to Exeter's outstanding historic environment.
10. Steering development to avoid areas of higher flood risk where possible and managing residual flood risk as appropriate.
11. Enabling development in locations which link effectively to the Valley Parks as vital green infrastructure whilst ensuring their protection and enhancement.
12. Providing high quality, mixed-use development at optimal densities appropriate to the characteristics and function of the local area to minimise the need to travel and maximise walking, cycling and public transport.
13. Reflecting local identities, providing for diverse neighbourhoods and delivering high quality public realm and community spaces to grow the city's cultural offer and drive regeneration.
14. Delivering the range of infrastructure needed to support high quality development and our communities in a timely manner.

Liveable Exeter principles

- 3.10 Exeter is a growing city and we are ambitious for its future. The Liveable Exeter initiative originally set out sites that could accommodate new homes within a series of high quality, brownfield developments.
- 3.11 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, have cafes, shops, community uses and workplaces.
- 3.12 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. 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.
- 3.13 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.
- 3.14 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.
- 3.15 Whilst some of 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 wellbeing 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.
- 3.16 The Liveable Exeter principles will apply to the large, brownfield 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.
- 3.17 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. To demonstrate this approach, the City Council is currently preparing a Development Framework and Design Code for the Water Lane site to specifically steer the quality of this regeneration area in the city.
- 3.18 The Liveable Exeter principles are included in policy S2. They are also expanded upon in a separate evidence document. The policy sets out the requirements for the standard of development that the City Council will expect for all strategic brownfield developments in the city. Developments that fail to achieve the standards set out in these principles will be refused. Following the Outline Draft Consultation, an additional principle relating to the importance of reflecting local culture in new development has been added.

S2: Liveable Exeter Principles (Strategic policy)

The delivery of strategic, brownfield developments will be supported.

Planning applications for the strategic brownfield development sites 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 strategic brownfield 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 in 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, market and specialist 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.

Principle 7: Connected Culture. Development will:

- Use culture to improve development quality to drive investment for strategic growth and sustainability in Exeter.
- Support local economic growth by providing flexible space for creative industries.
- Create resilient, adaptable, networked communities and successful centres that support civic pride and express local identity.
- Support high quality cultural place-making projects in the public realm and community facilities to achieve exemplary social value and environmental quality.
- Safeguard, promote access to, and reflect, cultural heritage in local place-making.
- Harness Exeter's rich heritage, local identities and creative talent through civic participation in culture and by supporting 'mean-while uses' whilst sites are being developed.

4 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.

Vision – City of Culture

Addressing climate change links to the aim in the 2040 vision of creating a city of culture where the environment plays a leading role. Mitigating and adapting to climate change can only be achieved through cultural exchange, engagement and a genuinely collective effort.

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 a net zero carbon city.

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, whilst adapting to the unavoidable impacts of climate change.

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 aim. Success will only be achieved through engagement and a genuinely collective effort; we need all organisations, individuals and institutions to play their part.
- 4.4 The City Council is 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).

- 4.5 Looking more 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 building 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.
- 4.6 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.
- 4.7 Renewable sources of energy include sun, wind and water power, and ground and air source heat pumps. Biomass energy from organic matter and energy from waste can also make an important contribution to cutting carbon emissions. 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 while community-led renewable and low carbon energy schemes also have an important role to play.
- 4.8 Green infrastructure, Sustainable Drainage Systems (SuDS), and other nature-based solutions to flood risk also have an important role in climate change mitigation. Through carbon sequestration (for example, trees storing carbon) and urban cooling, these nature-based solutions have a role that extends beyond the obvious environmental and health benefits.
- 4.9 Policy CC1 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.

CC1: Net zero Exeter (Strategic policy)

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 each of the following:

- 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 nature-based solutions to deliver flood risk management; and
- Providing green infrastructure, biodiversity net gain, and landscape-led schemes.

Renewable and low carbon energy

- 4.10 In order to achieve net zero it is vital that we increase the use and supply of renewable and low carbon energy. The National Planning Policy Framework identifies the responsibility of all communities to contribute to energy generation from renewable or low carbon sources.
- 4.11 Community initiatives are likely to play an increasingly important role and are encouraged as a way of providing positive local benefit from renewable energy development. Community organisations generating energy and/or providing energy advice in Devon are represented by the Devon Community Energy Network. Communities looking to set up new projects should make contact with the network. Examples of projects that are in the pipeline include rooftop solar and district heating networks.
- 4.12 There are also many examples of innovation from the private sector; from businesses delivering clean green hydrogen, research into new forms of battery storage, development of smart energy management systems, to schemes where surplus/waste heat is captured and used to provide 'free' heat elsewhere.
- 4.13 Many of these schemes are not classed as 'development' for the purposes of planning. Microgeneration and retrofitting existing premises is often permitted development that may not require an application for planning permission. However, where planning permission is required for renewable energy developments, the City Council will not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy. The City Council recognises that small-scale projects provide a valuable contribution to cutting greenhouse gas emissions and will approve development if its impacts are acceptable (or can be made acceptable by means of conditions). This approach is set out in policy CC2. Additional guidance on proposals involving heritage assets is provided in policy HH2: Heritage assets and climate change.

CC2: Renewable and low carbon energy

Renewable and low carbon energy-generating development, and all related enabling infrastructure (including battery storage and other energy storage facilities), will be supported where proposals avoid unacceptable impacts upon amenity and the natural, historic and built environment. Clear evidence of local community involvement and leadership will be given substantial positive weight.

Energy-generating development that is neither renewable nor low carbon will not be permitted.

Local energy networks

- 4.14 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.
- 4.15 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.
- 4.16 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 CC3 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.

CC3: Local energy networks (Strategic policy)

Local energy networks are proposed in the following locations:

- a. Monkerton and Hill Barton;
- b. The city centre, South Gate, Heavitree Road and Wonford;
- c. Matford, Marsh Barton, Water Lane and Exe Bridges Retail Park;
- d. Red Cow, New North Road and the University; and
- e. 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 proposal 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.

Ground-mounted photovoltaic arrays

- 4.17 In the UK we receive a vast amount of solar energy; in an average year we receive as much as 60% of the solar energy which is received at the equator. This can be compared to the yearly output of 1,000 power stations (Planning guidance for the development of large scale ground mounted solar photovoltaic systems, Building Research Establishment).
- 4.18 The Centre for Energy and the Environment (University of Exeter) was commissioned by the City Council to consider and map the potential for large scale ground-mounted photovoltaic arrays with the City. Whilst this high level analysis does not assess suitability, it does suggest that there is potential for ground-mounted photovoltaic array development within the city boundaries.
- 4.19 Ground-mounted arrays will not be suitable for all sites. The visual impact, both in terms of the physical form and resulting glare from the array, as well as any associated infrastructure and boundary treatment, will need to be carefully assessed in a Landscape and Visual Impact Assessment.
- 4.20 For any proposal, consultation with the City Council and local community is encouraged at an early stage. The local community should be engaged, by the developer, at the pre-design, conceptual stage, ideally using a local exhibition / presentation where community views can be sought and recorded. Opportunities for community benefit should be explored wherever practical.
- 4.21 Policy CC4 outlines criteria to be met in order for ground-mounted photovoltaic arrays to be supported by planning.

CC4: Ground-mounted photovoltaic arrays

Proposals for ground-mounted photovoltaic arrays will be supported if they:

1. Are sited on previously developed land or agricultural land of classification 3b,4 and 5;
2. Minimise visual impacts, including cumulative impacts, on the landscape;
3. Avoid adverse effects on the European Wildlife Sites and on any other known sites of biodiversity interest;
4. Do not result in the loss of public access, open space, areas of recreation, nor harm the potential opportunities for these functions;
5. Protect the setting of historic assets;
6. Avoid areas of high flood risk; and
7. Do not result in unacceptable amenity and safety impacts.

Future development standards

- 4.22 The Exeter Plan is likely to be adopted at a similar time to the proposed introduction of the Future Homes Standard (FHS) and the Future Building Standard (FBS). These Standards are being introduced by the Government in order to deliver highly efficient homes and non-domestic buildings respectively which are zero carbon ready, better for the environment and fit for the future. The new FHS should ensure that all new homes built after 2025 will produce 75 - 80% fewer carbon emissions than homes delivered under the Building Regulations Part L 2013. The reductions are required by the FBS for non-domestic buildings are yet to be announced, but are expected to be

similar in scale. This will significantly reduce the regulated operational emissions for a typical building and make an important contribution to achieving net zero.

- 4.23 In accordance with the Government's expressed intention to introduce the FHS and FBS in 2025, policy CC5 seeks to ensure that the level of ambition is achieved and the timetable does not slip. This provides a local back-up to the national ambition.

CC5: Future development standards (Strategic policy)

From 2025, residential development will be required to achieve a 78% carbon dioxide emissions reduction from that required under the 2013 Building Regulations and non-domestic buildings will be required to achieve a [TBC]% carbon dioxide emissions reduction from that required under the 2013 Building Regulations.

Note: The percentage reduction in carbon dioxide emissions for non-domestic buildings will be inserted into policy CC5 once announced by Government.

Embodied carbon

- 4.24 Embodied carbon emissions are those associated with raw material extraction, manufacture and transport of building materials, construction, maintenance, repair replacements, dismantling, demolition and eventual material disposal.
- 4.25 Around 10% of UK emissions are thought to be associated with the embodied carbon from new construction. As operational emissions increasingly reduce, embodied emissions will make up a greater proportion of total carbon from the whole life of a building. Work carried out for the Royal Institution of Chartered Surveyors (RICS) suggests that embodied carbon currently makes up 35 - 51% of a building's total emissions, rising to 70% as operational energy decarbonises.
- 4.26 A true net zero building is operationally net zero, made from 100% reused materials, and where 100% of the materials can be reused again at the end of its life (if construction, transport and disassembly are carried out with renewable energy). In practice this is extremely hard to achieve in the current UK market and so some embodied emissions are unavoidable. However, simply measuring embodied carbon emissions and then reducing these emissions as far as is possible through good design and planning, can make a significant difference.
- 4.27 Policy CC6 introduces the requirement to measure embodied carbon emissions and take action to reduce this impact. The policy also introduces a presumption against one-for-one replacement of habitable dwellings; an approach that is often taken without due regard to the impact in terms of carbon emissions.

CC6: Embodied carbon

To drive action to reduce embodied carbon emissions, major development proposals will only be permitted where:

- The impact on climate change from carbon emissions embodied in development materials is calculated using a nationally recognised carbon assessment method; and
- It is demonstrated that adequate steps have been taken in the design of the development to reduce this impact.

Minor residential development proposals that involve one-for-one replacement of existing habitable dwellings will only be permitted where it can be demonstrated that refurbishment is neither viable nor practical.

Solar-ready development

- 4.28 Even when the Future Homes Standard is implemented in 2025 not all developments will incorporate solar photovoltaic (PV) panels. On this basis, it is reasonable (given the minimal cost) to require new development to be designed and constructed to be 'solar-ready' to allow for later installation of PV.
- 4.29 To enable this, all major developments must be designed and constructed to optimise the use of solar photovoltaic panels. Where a site incorporates buildings with pitched roofs the site layout should maximise the number of buildings with the main roof aspect facing south east to south west. Buildings with pitched roofs should aim for a roof angle in the range of 35 - 40 degrees, dormers and other design features that break up roof spaces should be avoided, as should the overshadowing of roofs by adjacent buildings.
- 4.30 Buildings shall be constructed with:
- A static load roof strength where solar equipment can be placed, capable of supporting a minimum of [15] kg/m² on pitched roofs and [30] kg/m² on flat roofs.
 - Placement of non-solar related rooftop equipment that avoids shading of solar equipment and maximises continuous roof space with the aim of at least 75% continuous roof space unobstructed by heating, ventilation and air conditioning (HVAC) equipment, vents, or any other objects, with all objects located at the north end of the solar-ready roof.
 - Sizing and/or provision of extra electrical switchboard capacity in the building to accommodate the addition of an appropriately sized future solar energy system. Electrical switchboards in homes should have an excess of 30% capacity, and space for an additional electric switchboard should be provided in non-domestic buildings.
 - Provision of space in the building for a solar photovoltaic system DC-AC inverter in the vicinity of the photovoltaic panels or in another suitable location in the building.

- Conduits in the building to allow the easy running of cables from the photovoltaic panels to the DC-AC inverter and from the DC-AC inverter to the electrical switchboard.
- 4.31 Solar-ready construction will not be required where despite careful consideration at the design stage, the following are unavoidable:
- Solar resources are too poor, for example as a result of the building being in the shadow of other taller buildings; or
 - On north facing pitched roofs.
- 4.32 Policy CC7 seeks to ensure that all major development that does not incorporate solar photovoltaic panels is designed and constructed to be solar-ready.

CC7: Solar-ready development

All major development that does not incorporate solar photovoltaic panels when built must be designed and constructed to be ready for the later installation of solar photovoltaic panels, where this is feasible and practical and does not result in unacceptable impacts upon amenity and the natural, historic and built environment.

Flood risk

- 4.33 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.
- 4.34 Exeter's spatial strategy seeks to avoid areas of higher flood risk (from fluvial, surface water or other sources) by 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 mitigated through SuDS and other nature based solutions, and managed through design and site layout to ensure the development is appropriately flood resistant and resilient.
- 4.35 Policy CC8 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. For more information, applicants are advised to refer to the Sustainable Drainage Systems: Guidance for Devon document.
- 4.36 In areas of high flood risk (Flood Zones 2 and 3, and other areas of high flood risk) the risk of flooding should be recognised as a key constraint to development. New development should be seen as an opportunity to make improvements to green and

other infrastructure to reduce the causes and impacts of flooding in accordance with the National Planning Policy Framework.

CC8: Flood risk (Strategic policy)

In all areas at risk of flooding, development will only be permitted where it is demonstrated that the proposal satisfies the sequential test and, where necessary, the exception test. In Flood Zone 3 residential development will only be permitted where, in addition to satisfying these tests, it also contributes to reducing overall flood risk. A site-specific flood risk assessment will be required for all development proposals at risk of flooding. All development proposals must mitigate against flood risk by utilising SuDS unless there is clear evidence that this would be inappropriate.

Water quantity and quality

4.37 Local Planning Authorities must adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. Policy CC9 requires new development to contribute to reducing water demand, and improving water quality.

Quantity

4.38 Over recent years South West Water has reported unprecedented demand for water in the Exeter area; this is partially as a result of the trend towards staycations, but also as a result of warmer summers and drier winters. This increase in demand, combined with the changes in climate, puts a strain on the water supply infrastructure and sources used for abstraction. This is a foretaste of the pressures that are likely to be felt in the future regarding water supply as we experience more of the effects of climate change.

4.39 Under climate change scenarios up to 2050, the Devon, Cornwall & Isles of Scilly area is modelled to potentially be impacted by much lower summer flows due to lower rainfall. In light of the evidence of emerging trends towards water being an increasingly scarce resource, a tighter water efficiency requirement of 110 litres per person per day for new homes is justified to help manage demand.

Quality

4.40 The Exeter Plan area includes 7 water bodies: Lower River Clyst, Upper River Clyst, North Brook, River Exe (Creedy to Estuary), Alphin Brook, Matford Brook and the Exe. Of these 7 water bodies, 6 have been identified as failing to meet 'good' ecological status under the Water Environment Regulations due to having excess levels of nutrients. The sources of nutrients in these water bodies have been identified as urbanisation, agriculture, water company activities, septic tanks, misconnections and private sewage treatment. Over the plan period, the additional development and the decreased dilution that will be experienced in waterbodies because of climate change, will see these pressures become more acute without appropriate interventions.

4.41 There may be potential to deliver enhancements within the Valley Parks and landscape setting areas that help return Exeter's water bodies to 'good' ecological

status under the Water Environment Regulations. However, it will also be necessary to look upstream of these waterbodies outside Exeter's boundaries, to deliver some of these enhancements. Development proposals that support the return of Exeter's water bodies to 'good' ecological status will be supported.

- 4.42 The delivery of the South West Water Drainage and Wastewater Management Plan will also be key to addressing this issue. The City Council will continue to work closely with partners including South West Water to deliver this emerging plan, and where necessary, infrastructure contributions will be sought. SuDS will be sought through policy CC8: Flood risk (and the associated legislation). Policy HW2: Pollution and contaminated land, also seeks to ensure development proposals will only be permitted where there are no unacceptable impacts on surface and ground water quality.

CC9: Water quantity and quality

All new residential development must achieve as a minimum water efficiency that requires an estimated water use of no more than 110 litres per person per day.

Development proposals that support the return of Exeter's water bodies to 'good' ecological status, and thereafter maintains that status, will be supported. Development proposals that harm the ecological status of any of Exeter's water bodies will not be supported.

The City Council will work closely with South West Water and all other partners to help deliver the Drainage and Wastewater Management Plan and, where necessary, contributions will be sought towards water infrastructure.



5 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 housing and building great neighbourhoods and communities and delivering a healthy and active city.

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 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, care leavers, students and gypsies and travellers all have specific housing needs which we need to meet.

Housing requirement

- 5.2 The Government updates housing requirements annually and as of 2023 it requires the City Council to plan for 642 new homes to be built in Exeter each year. This means 12,840 homes are needed over the 20 years of the Exeter Plan.
- 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 14,124 homes for twenty years allows for a healthy headroom of 10% above the target of 642 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 2,600 homes have been built in Exeter since April 2020 and planning consents (including permissions awaiting Section 106 Agreements) are in place for a further 5,300 homes. In addition, we anticipate that just under 950 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 required 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 of 14,124. As policy H1 shows, to meet the housing requirement we need to allocate sites for around 5,270 new homes. As well as housing, the larger sites will provide employment and various other uses and infrastructure to provide high quality new neighbourhoods.

H1: Housing requirement (Strategic policy)

The City Council will target the delivery of at least 642 homes per year between 2020 and 2040. To meet this target and allow for a headroom of 10%, delivery of 14,124 homes is proposed from the following sources:

- A total of 2,604 completions in 2020/21, 2021/22 and 2022/23;
- Approximately 5,304 homes from existing planning consents;
- Approximately 5,272 homes on site allocations; and
- Approximately 944 homes on windfall sites.

Housing allocations

- 5.6 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.
- 5.7 The list also includes a number of smaller brownfield sites and some greenfield sites that are within the urban area. Two 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.
- 5.8 The majority of the sites can be built within twenty years. The exceptions are the two larger brownfield sites at Marsh Barton and Water Lane 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 are provided in the Site Allocations section of the plan.
- 5.9 To ensure that the housing requirement is met, housing development on windfall sites within the urban area will be supported provided that proposals comply with all relevant policies in the development plan. This includes developments in residential gardens where proposals reflect the pattern of streets and buildings, the plot sizes and the ratio of built form to garden of the surrounding area. However, innovative designs can also sometimes help to achieve an acceptable solution that respects the area's character. Proposals for residential annexes that do not have a physical or functional link with the main home will be assessed as new homes under policy H3 and other relevant policies in the development plan.

- 5.10 The six strategic brownfield development sites were included in the original Liveable Exeter initiative. The previous outline draft version of the plan included all eight of the original Liveable Exeter sites. The Liveable Exeter sites at West Gate and Sandy Gate are not included in this draft plan. At Sandy Gate this is because of constraints associated with employment land, a school, the Sidmouth Road Park and Ride and the M5 motorway services. At West Gate this is because of constraints associated with the Riverside Leisure Centre, the operation of the Exe Bridges roundabout and historic environment assets including the medieval bridge and St Edmund's Church. The retail park at Exe Bridges is retained as a smaller allocation.
- 5.11 A revision has been made to the boundary of the South Gate site to remove areas of current housing and the Cathedral and Quay car park due to delivery constraints; the site now focuses on the Magdalen Street Car Park and the highway land in the area. A small revision has been made to the Red Cow site to include the university accommodation south of the station forecourt on Bonhay Road. Finally, the East Gate site has been slightly extended to include the Manor Court office building at Dix's Field.

H2: Housing allocations and windfalls (Strategic policy)

The following sites are proposed for allocation in the Exeter Plan for the provision of new homes, with associated infrastructure:

Strategic brownfield development sites: Mixed use

Site	Reference	Number of homes
Marsh Barton	14	1,000
Water Lane	15	1,600
East Gate	52	850
Red Cow	22	280
North Gate	42	200
South Gate	46	170

Predominantly residential sites

Site	Reference	Number of homes
Land at Old Rydon Lane	89	350
Land at Cowley Bridge Road	143	231
Exe Bridges Retail Park	39	230
12-31 Sidwell Street	51	51
Land at Exeter Squash Club, Prince of Wales Rd	26	40
Land at Newcourt Road, Topsham	91	38
Land adjoining Silverlands	18	37
Belle Isle Depot, Belle Isle Drive	72	33
Land to the west of Newcourt Road, Topsham	94	31
Chestnut Avenue	75	26
Former overflow car park, Tesco	80	18
Land behind 66 Chudleigh Road	125	16
East of Pinn Lane	106	14
Land at Hamlin Lane	60	13
Fever and Boutique, 12 Mary Arches Street	100	10

88 Honiton Road	110	10
Garages at Lower Wear Road	84	9
99 Howell Road	24	6

The principle of housing development on unallocated windfall sites within the urban area will be supported.

Affordable housing

- 5.12 In meeting the Government's housing requirement, it is important that we help to deliver the variety of homes that our communities need. This includes affordable homes, which are particularly important at this time when the costs of living are high and when many people face difficulties in paying everyday bills.
- 5.13 Affordable housing is defined more fully by the Government in the National Planning Policy Framework, but can be summarised as subsidised housing for people whose needs are not met by the market. Broadly it includes:
- Affordable housing for rent: This includes homes for social rent and affordable rent, which are managed by a Registered Provider and let with subsidised rents. Social rented homes have the highest level of subsidy and therefore the lowest rent.
 - Affordable home ownership: These homes give the occupants the option to buy at subsidised prices in various ways, either immediately or after some years of living in the properties. First Homes are one type of affordable home ownership, comprising new properties built as part of larger housing developments that are sold with a discount from market prices of at least 30%. The discount is retained each time the property is sold. Other affordable home ownership products include shared ownership and rent to buy.
- 5.14 Affordable Housing will be provided in accordance with the City Council's emerging Housing Strategy and the Exeter Local Housing Needs Assessment (LHNA). The LHNA calculates that around 35% of Exeter's housing requirement comes from households who need affordable housing. In advance of a whole-plan viability assessment of the plan, a judgment has been made that 35% may be a reasonable and viable quantity of affordable housing to seek from major developments using Section 106 Agreements. This is the policy requirement in the City Council's existing Core Strategy policy. The types of housing development to which this percentage will apply include new build, conversion and mixed use schemes, phased developments, developments by Registered Providers, and other proposals for self-contained dwellings (e.g. extra care or assisted living housing). Policy H3 does not apply to build to rent and co-living housing, for which different affordable housing requirements are set out in policies H4 and H5, or to purpose built student accommodation, which is not subject to an affordable housing requirement.
- 5.15 In advance of a whole-plan viability assessment of the plan, the proposed tenure split in policy H3 reflects the types of affordable housing that the LHNA calculates are needed in Exeter. The greatest level of need is for social rented homes. First Homes delivered under criterion a(iv) should be sold with a discount from market prices of at least 50%.

- 5.16 In line with policy H13 which seeks to optimise residential densities, the City Council will negotiate development at a higher density where it considers that the number of dwellings proposed for the site is too low. This may alter the affordable housing requirement. When applying the percentages in the policy, calculations will be rounded to the nearest whole number.
- 5.17 Where the City Council accepts a less than policy compliant amount of affordable housing on grounds of viability, an overage clause will be sought in the Section 106 Agreement in respect of future profits and affordable housing provision. The need for an overage payment will be established through the submission of a development account once the scheme has been completed.
- 5.18 The City Council expects affordable housing to be provided on-site. Affordable homes provided on-site should be grouped in clusters of no more than ten units spread across the site. Off-site provision or a financial contribution in lieu will only be agreed by the City Council in exceptional circumstances, for example because it will result in a better mix of housing tenures in a locality. The methodology for calculating financial contributions will be published on the City Council's website, with costs updated annually. Contributions will be used by the City Council for the provision of affordable housing in Exeter.
- 5.19 Affordable homes should be delivered without public subsidy and (with the exception of First Homes) be disposed of to a locally operating registered provider agreed with the City Council. Should the affordability restriction on an affordable home be lifted, the subsidy will be recycled to provide new affordable housing within Exeter as approved by the City Council. The affordable homes must be made available to eligible and qualifying households who meet the City's Council's local connection criteria or to key workers.
- 5.20 In addition to seeking affordable housing through policies H3, H4 and H5, the City Council aims to deliver 500 new affordable Council homes by 2030.

H3: Affordable housing (Strategic policy)

Affordable housing will be required on developments of 10 dwellings or more or with a site area of 0.5 hectares or more. The affordable housing will be delivered as follows:

- a. At least 35% of the proposed homes will be affordable housing, to remain at an affordable price in perpetuity and to include:
 - i. 50% homes for social rent;
 - ii. 13% homes for affordable rent;
 - iii. 25% First Homes with a discount of at least 30% on market prices; and
 - iv. The remaining balance to comprise an additional affordable homeownership product(s).
- b. Custom and self-build homes, specialist accommodation and accommodation for gypsies and travellers will be considered as affordable housing where it complies with the definition of affordable housing in the National Planning Policy Framework and the requirements of this policy;
- c. The City Council will only accept a departure from these percentages if it agrees that scheme viability will be affected, based on a full development appraisal submitted by the applicant;
- d. The size mix of the affordable homes must reflect local need, as evidenced by the City Council's latest Local Housing Needs Assessment;

- e. The affordable homes must be provided on-site unless the City Council agrees that there is robust justification to allow off-site provision or a financial contribution in lieu of on-site provision;
- f. The affordable homes must be fully integrated into the development, built to the same standards as the market homes and completed proportionately with the market homes; and
- g. If the development is eligible for Vacant Building Credit, the applicant must set out this evidence in a Vacant Building Credit Statement.

Note: Policy not yet tested by viability appraisal.

Build to rent

- 5.21 Build to rent is high quality housing that is purposely built for private sector rent, although it can form part of a larger multi-tenure development. Schemes offer longer tenancy agreements of three years or more and are professionally managed, in single ownership and management control. Residents are usually households that can afford to buy a home on the open market, but choose not to for varying reasons. Build to rent can play a role in meeting the need for high quality, well-managed and secure private rented housing in Exeter.
- 5.22 Affordable housing on build to rent schemes should be provided in the form of affordable private rent, unless the City Council agrees that an alternative type of affordable housing is appropriate. In accordance with the Government's Planning Practice Guidance, policy H4 requires 20% of homes on build to rent schemes to be for affordable private rent, made available to eligible and qualifying households who meet the City Council's local connection criteria or to key workers. When applying this percentage, the calculation will be rounded to the nearest whole number. Should the affordability restriction on an affordable home be lifted, the subsidy will be recycled to provide new affordable housing within Exeter as approved by the City Council.

H4: Build to rent

Build to rent housing proposals will be supported provided that they:

- a. Provide high quality housing, designed and built specifically and entirely for rent;
- b. Are held as build to rent for at least 15 years under a covenant;
- c. Offer tenancies of three years or more to all tenants, with rent and service charge certainty for the tenancy period; and
- d. Are in single ownership and control and professionally managed in accordance with a management plan.

On build to rent developments of 10 or more homes or with a site area of 0.5 hectares or more, at least 20% of the homes will be for affordable private rent and delivered as follows:

- a. The affordable homes must be secured as affordable private rent in perpetuity;
- b. The affordable homes must be let with rents (inclusive of any service charges) set at local housing allowance level;
- c. The affordable homes must be owned and managed by the same landlord as the market build to rent homes;

- d. The affordable homes must be fully integrated with, and built to the same standards as, the market build to rent homes; and
- e. The affordable homes must be provided on-site, unless the City Council agrees that there is robust justification to allow off-site provision or a financial contribution in lieu of on-site provision.

Co-living housing

- 5.23 Co-living housing is high quality accommodation that is purposely built for private sector rent. It is a type of non-self-contained housing with an emphasis on communal living and social interaction; communal spaces and facilities are provided to offset private individual bedrooms that may be smaller than nationally described space standards. Co-living developments differ from houses in multiple occupation due to their larger size and the extent of communal spaces and facilities. They differ from hotels and hostels due to the requirement for minimum tenancies of no less than three months.
- 5.24 Co-living housing will not be appropriate for everyone but can provide accommodation for single people or couples who choose not to live in self-contained houses, flat shares or HMOs (Houses in Multiple Occupation). Occupation is not restricted to any particular group of people and is typically aimed at young professionals. The Local Housing Needs Assessment concludes that co-living developments could help to address the increasing lack of housing for young people in Exeter.
- 5.25 To ensure that co-living housing provides an acceptable standard of amenity for residents, the City Council will expect private bedrooms to meet nationally described space standards, or to do so when an allowance for communal spaces and facilities is taken into account. As a minimum, each resident must have convenient access to a communal kitchen, dining space, social space, workspace, outdoor amenity space, laundry and drying facilities and storage and refuse facilities. These minimum facilities must be included within the rent and be readily available to residents, with no need to book. To help build relations with the local community, some communal facilities and spaces (e.g. restaurants and gyms) may be made available to the wider public where appropriate.
- 5.26 Planning applications must be accompanied by a management plan, to be agreed with the City Council and secured through a Section 106 Agreement. The management plan must show how the whole development will be managed and maintained to a high quality, provide acceptable levels of amenity to neighbouring residents and ensure an appropriate mix of tenants. Matters to be covered will include:
- On-site management/concierge;
 - Security and fire safety procedures;
 - Move-in and move-out arrangements;
 - The maintenance of internal and external areas of the development;
 - The cleaning of communal and private spaces and operation of linen changing services (if provided);
 - The management of facilities for wider public use (if provided);
 - The management of deliveries;

- The provision of activities for residents to encourage social interaction; and
 - The regulation of types of residents.
- 5.27 As co-living is a form of built to rent housing, 20% of the bedrooms should be for affordable private rent. This will be secured in accordance with policy H4.
- 5.28 Given the City Council's net zero ambitions, policy H5 requires co-living developments to be located where day-to-day needs (including employment) can be met without using a private car. Proposals should also not contribute to an excessive concentration of co-living housing in the locality, as this will not support the maintenance or creation of a mixed community.
- 5.29 Since the market for co-living housing in Exeter is relatively new, applicants must show that consideration has been given to the future use of the building should it become surplus to requirements. For example, adaptations could allow the premises to be used as student accommodation, alternative build to rent housing, or office space.

H5: Co-living housing

Co-living development proposals will be supported when they:

- a. Provide high quality housing designed and built specifically and entirely for rent;
- b. Provide residents with a private ensuite bedroom in a cluster or studio flat, within a development that includes sufficient communal facilities and services to meet the needs of all residents;
- c. Deliver at least 20% homes for affordable private rent, in accordance with policy H4;
- d. Do not contribute to an excessive concentration of co-living housing in the locality;
- e. Are located within a controlled parking zone and are well connected to employment and local services and facilities by walking, cycling and public transport;
- f. Are accompanied by a travel plan and travel pack and includes no private car parking other than for people with disabilities;
- g. Incorporate appropriate facilities for bike storage, vehicle drop-off and pick-up and service vehicles;
- h. Are in single ownership and control and are professionally managed in accordance with a management plan that enables the City Council to regulate the types of residents within the development;
- i. For all of the homes, provide minimum tenancy lengths of no less than three months and offer all-inclusive rent that covers utilities and access to on-site services; and
- j. Are future-proofed in terms of design to support potential alternative uses as appropriate.

Custom and self-build housing

- 5.30 A custom or self-build home is a home built or commissioned by an individual (or group of individuals) for their own occupation, where they have meaningful input into the final design and layout. The Self-Build and Custom Housebuilding Act 2015 requires the City Council to keep a register of individuals and groups who wish to acquire serviced plots of land in Exeter in order to custom or self-build a home and to have regard to that register when carrying out its functions. The City Council also has

a legal duty to grant enough planning consents to meet the level of demand for custom and self-build housing expressed by the register. Policy H6 sets out how the City Council intends to meet that legal duty.

- 5.31 Since the City Council's register was opened in 2016, demand has been expressed for around 23 custom and self-build plots per year by residents of Exeter and people living further afield. The City Council is currently working to further promote the register. The site threshold and percentage requirement in criterion b of policy H6 will be determined once that work is completed, also taking into account the whole-plan viability assessment of the plan.
- 5.32 Serviced plots secured under criterion b must be provided on-site and made available for sale before construction has commenced on 50% of the other homes on the site. On phased developments that meet the policy threshold, each phase should meet the percentage requirement. The City Council will only accept a departure from the percentage requirement if it agrees that scheme viability will be affected, based on a full development appraisal submitted by the applicant. Financial contributions in lieu of on-site provision will only be considered acceptable where the City Council agrees that on-site provision will prejudice delivery of the wider scheme. Financial contributions will be based on up-to-date evidence of custom and self-build plot values.
- 5.33 A serviced custom or self-build plot is one where the following infrastructure is provided by the developer of the wider site:
- Access to/from the public highway. The plot does not need to adjoin the public highway, but it must have a guaranteed right of access and this should be sufficiently easy to facilitate the delivery of bulky materials during construction; and
 - Electricity, water and waste water connections. Services must be provided to the boundary of the plot so connections can be made during construction, or adequate alternative arrangements must be possible such as the use of a cesspit rather than mains drainage.
- 5.34 To ensure high design quality, the City Council may require applicants to prepare design codes and plot passports for schemes involving custom and self-build housing. These may be secured by means of a condition at outline planning application stage. Detailed (i.e. full or reserved matters) planning applications must include sufficient information to show that the initial homeowner has had primary input into the final design and layout of the home.
- 5.35 In terms of criterion a and b of the policy, applicants should offer a range of serviced plot sizes. These should be clustered together, clearly marked out and not be crossed by services or rights of way. The City Council will require plots to be marketed in accordance with a strategy and valuation that it has approved. If a plot has not been sold at the end of the marketing period, the City Council may accept its return to an open market unit.

H6: Custom and self-build housing

Custom and self-build housing will be supported:

- a. On the following sites, which are allocated for custom housebuilding:
 - i. Land adjoining Silverlands 37 homes
 - ii Land behind 66 Chudleigh Road 16 homes
 - iii Former overflow car park, Tesco, Russell Way 18 homes
 - iv Land at Newcourt Road, Topsham 38 homes
- b. On development proposals of [TBC] or more homes, where [TBC]% of serviced plots should be made available to custom house-builders;
- c. On windfall sites within the urban area; and
- d. As part of the affordable housing provision on major developments, provided that the custom and self build homes comply with the definition of affordable housing in the National Planning Policy Framework and the requirements of policy H3.

Plots for custom and self-build housing will be provided as follows:

- a. A range of plot sizes must be provided having regard to demand expressed by the City Council's custom housebuilding register. The plots must be integrated within the wider development;
- b. Plots for detached homes must have scaffold margins within the plot boundary and be free of party-wall requirements;
- c. Prior to marketing, each plot must be developable by a custom house builder or self-builder, with no constraints to prevent immediate purchase and development. The City Council must be satisfied that legal access and servicing will be possible for plot purchasers before outline or full planning permission is granted; and
- d. Each plot must be actively and appropriately marketed for at least 12 months from it being fully serviced and developable.

Note: The numbers of custom and self-build homes and percentage of custom and self-build homes to be included in criterion b will be inserted into policy H6 following further work on the custom and self-build housing register.

Specialist accommodation

- 5.36 Specialist accommodation encompasses a wide range of housing for people with support needs. It includes, but is not limited to, housing for children in care, young people leaving care or with other support needs, older people who require at least an element of care, people with disabilities who require additional support or for whom independent living is not possible, victims of domestic abuse, rough sleepers and people leaving hostels and refuges. Specialist accommodation 'products' include sheltered housing, supported living, extra care housing, residential care homes, nursing homes and children's homes.
- 5.37 There is a shortage of specialist accommodation in Exeter, in quantity, range and affordability. Evidence also indicates that the need for housing with support will increase over the plan period. For example, the Institute for Public Care predicts that, between 2020 and 2040, the number of people living in Exeter aged 65 or over with a limiting long term illness will increase by around 4,500, the number of people aged 65 or over who require care home accommodation will increase by around 450, and the

number of people aged 18 to 64 with a mental health disorder will increase by around 300.

- 5.38 Policy H7 supports the provision of good quality specialist accommodation for which there is an identified housing need and sets out requirements that new developments must meet (subject to the intended resident group. For example, criteria c and d of the policy will not apply to housing for young people leaving care). Given the economic profile of the majority of people who need specialist accommodation, particular support will be given where proposals meet the National Planning Policy Framework definition of affordable housing and where the applicant can demonstrate close working with Devon County Council on the provision of care packages for residents (where relevant). Self-contained specialist housing will be expected to deliver affordable housing in accordance with policy H3.
- 5.39 Devon County Council has advised that around 250 units of extra care housing are required in the city by 2033. To help meet this identified need, the proposed site allocations at Marsh Barton and Water Lane include a requirement to provide an extra care housing scheme.

H7: Specialist accommodation

Development proposals for good quality supported and specialist accommodation which meet an identified need will be supported, where they:

- a. Are designed to meet the support and care needs of the residents and enable them to retain their independence;
- b. Are well-connected to local services and community and support facilities, including health facilities and public transport;
- c. Provide suitable levels of safe storage and charging facilities for residents' mobility scooters;
- d. Provide accessible pick-up and drop-off facilities close to the principal entrance suitable for taxis, minibuses and ambulances; and
- e. Do not result in unacceptable harm to the amenity of neighbouring residents.

Specialist accommodation may be provided to meet the affordable housing requirements arising from policy H3, provided that it complies with the definition of affordable housing in the National Planning Policy Framework and the requirements of policy H3.

Purpose built student accommodation

- 5.40 The University of Exeter is of great importance to the city's socio-economic and cultural prosperity. The number of full time equivalent students studying at the University's Exeter campuses has increased significantly in recent years, from 11,220 in 2006/07 to 27,300 in 2021/22. The University currently forecasts more limited growth over the next few years, although this is uncertain due to the ever-changing landscape of higher education.
- 5.41 The City Council will support proposals for purpose built student accommodation where they meet the criteria set out in policy H8. This is because purpose built student accommodation provides students with good quality, well managed housing and it eases pressure on existing housing. The University guarantees to provide accommodation for first years in University-managed accommodation, to ensure that

students are supported during the transition from home-life. Since 2006/07, the University and City Council have also shared a target for at least 75% of additional student numbers to be housed in purpose built student accommodation. Progress is being made to achieving this target, with 64% of new students since 2006/7 being housed in purpose built student accommodation by 2022.

- 5.42 The approach to supporting purpose built student accommodation in appropriate locations goes hand in hand with work being undertaken by the City Council on houses in multiple occupation (HMOs) and the associated Article 4 Direction that is currently in place. The Article Direction restricts the ability to convert regular houses into HMOs which are often occupied by students. The restriction currently covers an area close to the University of Exeter's Streatham and St Luke's campuses. Earlier in 2023 the City Council consulted on options to extend the area of restriction.
- 5.43 Given the City Council's net zero ambitions, purpose built student accommodation should be located where students' day-to-day needs can be met without using a private car. Proposals should also not contribute to an excessive concentration of purpose built student accommodation in the locality, as this will not support the maintenance or creation of a mixed community.
- 5.44 Purpose built student accommodation must provide residents with a good standard of amenity. Private bedrooms must be of an adequate size and students must have convenient access to sufficient space for cooking, dining, socialising and working, outdoor amenity space, laundry and drying facilities and storage and refuse facilities.
- 5.45 Planning applications must be accompanied by a management plan, to be agreed with the City Council and secured through a Section 106 Agreement. The management plan must show how the whole development will be managed and maintained to a high quality and provide acceptable levels of amenity to neighbouring residents. Matters to be covered will include:
- On-site management/concierge;
 - Security and fire safety procedures;
 - Move-in and move-out arrangements;
 - The maintenance of internal and external areas of the development;
 - The cleaning of communal and private spaces and operation of linen changing services (if provided); and
 - The management of deliveries.
- 5.46 The City Council will use Section 106 Agreements to ensure that purpose built student accommodation is solely occupied by students during term time. Lettings to non-students during University holiday periods may be appropriate, for example as accommodation to support University conferences.
- 5.47 Given the uncertainties around the future growth of the University, applicants for purpose built student accommodation must show that consideration has been given to the future use of the building should it become surplus to requirements. For example, adaptations could allow the premises to be used as co-living or built to rent housing, or office space.

H8: Purpose built student accommodation

Development proposals for purpose-built student accommodation will be supported when they:

- a. Are located on the University of Exeter's campuses, in the city centre or on sites that are within controlled parking zones and well-connected to the campuses, local services and facilities by walking, cycling and public transport;
- b. Do not contribute towards an excessive concentration of purpose built student accommodation in the locality;
- c. Provide residents with high quality housing comprising a private ensuite bedroom in a cluster flat or studio, within a wider development that includes sufficient communal facilities and services to meet student needs;
- d. Are accompanied by a travel plan and travel pack and includes no private car parking other than for people with disabilities;
- e. Incorporate appropriate facilities for bike storage, vehicle drop-off/pick-up and service vehicles;
- f. Are in single ownership and control and professionally managed in accordance with a management plan; and
- g. Are future-proofed in terms of design to support potential alternative uses as appropriate.

Gypsy and traveller accommodation

- 5.48 Policy H9 aims to facilitate the provision of accommodation for Gypsies, Travellers and Travelling Showpeople in a way that considers the travelling community's wellbeing and traditional way of life whilst respecting the interests of Exeter's settled community. No new sites for permanent accommodation are identified in this draft of the plan. This is based on the findings of a Gypsy and Traveller Accommodation Assessment for Exeter which indicates only a low level of need from households that meet, or may meet, the planning definition of Gypsies, Travellers and Travelling Showpeople. It is likely that additional needs can instead be met on small windfall sites following consideration against policy H9. This has occurred in the past and allows members of the travelling community to bring forward sites to meet their specific requirements.
- 5.49 The Gypsy and Traveller Assessment has not yet concluded on the need for additional transit pitches in Exeter. The Assessment's findings will be reflected in the next consultation version of the plan.
- 5.50 Whether permanent or transit, new sites for Gypsy and Traveller accommodation should be designed and located in accordance with policy H9 and other relevant policies in the Exeter Plan. Sites must be located where the local environment is of a satisfactory quality, so locations adjacent to noisy or polluting land uses or in areas of flood plain will not be suitable. The Department for Communities and Local Government Advice Note 'Designing Gypsy and Traveller Sites' Good Practice Guide (May 2008) provides a good benchmark for considering the design of new sites and should be considered alongside policy H9.

H9: Gypsy and traveller accommodation

Development proposals for gypsy and traveller pitches, or plots for travelling show-people will be supported where:

- a. Suitable onsite facilities are provided including space for parking, storage, children's play, sewage and waste management;
- b. Safe and convenient vehicular, pedestrian and cycle access to local facilities are provided and proposals minimise impacts on the local highway network;
- c. The site provides suitable environmental quality for the residents;
- d. There is no unacceptable harm to the amenity of neighbouring residents; and
- e. The proposal does not cause unacceptable landscape or ecological impact and is not in an area at high risk of flooding.

Gypsy and traveller accommodation may be provided to meet the affordable housing requirements arising from policy H3, provided that it complies with the definition of affordable housing in the National Planning Policy Framework and the requirements of policy H3.

Residential conversions and houses in multiple occupation

- 5.51 The conversion of an existing building (e.g. a house or guesthouse) to flats or a House in Multiple Occupation (HMO) can make a valuable contribution to the housing stock, provided that environmental health standards are maintained, amenity is appropriate and unacceptable highways problems do not result. All HMOs should meet HMO licence standards (including space standards) to ensure an appropriate level of amenity for occupants. In addition, proposals must meet nationally described space standards where they involve converting houses to flats, or non-residential buildings to flats or HMOs.
- 5.52 The majority of HMOs in the city are occupied by students studying at the University of Exeter. Existing HMOs are focused in locations close to the University's campuses, which can affect their character. The City Council has introduced an Article 4 Direction in these locations to help manage further increases in the number of HMOs. The Article 4 Direction means that, in these locations, changes of use from Class C3 (dwelling houses) to Class C4 (HMOs occupied by between three and six people who share a bathroom, toilet or kitchen) will require planning permission. Within the Article 4 area, planning applications for new HMOs will not be granted planning consent. A map of the Article 4 Direction area is available on the City Council's website. This is currently being reviewed by the City Council.
- 5.53 Policy H10 will apply to changes of use from Class C3 to Class C4 HMOs in the Article 4 area and, throughout the city, to changes of use or conversions of existing buildings to flats, Class C4 HMOs and sui generis HMOs. The City Council's Houses in Multiple Occupation Supplementary Planning Document (also currently being reviewed) will provide additional guidance on the implementation of policy H10 and the Article 4 Direction, the Residential Design Supplementary Planning Document (SPD) provides further details on the City Council's approach to residential conversions and the Sustainable Transport SPD provides the standards used to determine an appropriate level of car and cycle parking.

H10: Residential conversions and houses in multiple occupation

Development proposals for the conversion or change of use of a building to flats or a house in multiple occupation will be supported when they:

- a. Respect the character and appearance of the building and surrounding area;
- b. Will not cause unacceptable harm to the amenity of neighbouring residents;
- c. Provide high quality housing that includes sufficient internal and external space to meet the residents' needs;
- d. Make appropriate provision for refuse storage and car and cycle parking; and
- e. Will not have unacceptable transport impacts.

Development proposals for the conversion or change of use of a building to a house in multiple occupation in the Article 4 area will not be permitted.

Loss of residential accommodation

- 5.54 There is a high demand for housing in Exeter and a substantial requirement for new homes. Retaining existing homes and making full use of the existing housing stock complements the provision of new residential sites and helps to ensure a wide choice of homes in accordance with the National Planning Policy Framework. Whilst there may be occasions where other material considerations warrant the loss of residential accommodation, policy H11 will ensure that existing homes are retained in most cases.

H11: Loss of residential accommodation

Development proposals which result in a net loss of residential units will not be permitted.

Accessible homes

- 5.55 The number of people in Exeter with limiting long term illnesses or disabilities that affect their housing needs is significant and growing. It is important that people have the choice of remaining in their own homes rather than moving due to inaccessible housing.
- 5.56 Whilst the requirements of policy H12 may have to be modified following a whole-plan viability assessment of the plan, the need for accessible homes in the city justifies setting Building Regulations M4(2) as the default minimum standard for all new homes. It also warrants requiring 10% of market homes on all new housing developments to be adaptable for wheelchair users and requiring 10% of affordable homes on all new housing developments to be adapted for wheelchair users at the point of completion (in both cases meeting Building Regulations M4(3) standards). Once fixed, the City Council will only accept a departure from the percentages in policy H12 where it is satisfied that they are not feasible for site specific or viability reasons. If a departure from the M4(2) requirement is accepted, the City Council will instead expect the proposed homes to meet Building Regulations M4(1) standards.
- 5.57 M4(3) homes should be distributed throughout a development to provide a range of locational choices, aspects, views and unit sizes. Where any part of an approach

route (including the vertical circulation in communal areas of an apartment block) is shared between dwellings of different categories (i.e. M4(2) and M4(3)), the design provisions of the highest numbered category of home served should be applied. This will ensure that residents are not limited by the design of communal areas.

H12: Accessible homes

New housing development will include the following proportions of accessible homes:

- a. Market homes: At least 10% will be built to meet wheelchair adaptable standards (Building Regulations M4(3)), with the remainder built to meet accessible and adaptable standards (Build Regulations M4(2)); and
- b. Affordable homes: At least 10% will be built to meet wheelchair adapted standards (Building Regulations M4(3)), with the remainder built to meet accessible and adaptable standards (Build Regulations M4(2)).

Housing density and size mix

- 5.58 For Exeter to accommodate its housing requirement in an inclusive and responsible way, every development involving new homes must make the most efficient use of land. This means optimising the density of housing development so that it is appropriate for the site and surrounding area taking into account constraints such as heritage assets, local amenities and the character of the area and any on-site requirements such as public open space and active travel measures that are needed to ensure that development is of a high quality.
- 5.59 The housing density of a development is linked to the number of bedrooms provided within each new home. The latest Local Housing Needs Assessment indicates that market and affordable homes of all sizes will be needed in Exeter to 2040, but particularly two and three bedroomed properties. Family housing should not be omitted from new developments due to a concentration on densities and the range of proposed house sizes must support the creation or maintenance of mixed communities.
- 5.60 Policy H13 sets out criteria to ensure that development proposals for housing offer the most optimal density of housing and mix of house size.

H13: Housing density and size mix (Strategic policy)

Development proposals for housing will:

- a. Make the best use of land by optimising density, taking into account local context; and
- b. In the case of developments of 5 homes or more, incorporate an appropriate mix of house sizes, taking into account:
 - i. Local need, as evidenced by the City Council's latest Local Housing Needs Assessment;
 - ii. The aim to optimise housing densities;
 - iii. The proposed tenure mix of the development; and
 - iv. The mix of house sizes in the locality.

Residential amenity and healthy homes

- 5.61 It is important that the amenities of existing residents are not harmed by new development. It is also imperative that new homes provide residents with a good standard of amenity and safe and healthy living conditions. Policy H14 is one of a raft of policies in the plan intended to ensure that new homes are healthy and safe. Unless specified elsewhere in this chapter, new homes must meet nationally described space standards. The City Council's Residential Design Guide SPD provides additional guidance on the City Council's approach to ensuring good standards of amenity are achieved.
- 5.62 Planning is concerned with the control of land use in the public interest. In general, the protection of purely private interests such as the impact of a development on the value of a neighbouring property or loss of private rights to light or a view are not material planning considerations.

H14: Residential amenity and healthy homes

Development proposals will be supported when they do not result in unacceptable harm to the amenity of neighbouring residents and, where new housing development is proposed, when they provide safe and healthy living conditions, and good standards of amenity for future occupiers of the development. The following factors will be taken into account:

- a. Privacy and overlooking;
- b. The availability of natural light and outlook;
- c. Whether the proposal is overbearing;
- d. Light and air pollution;
- e. Noise and disturbance;
- f. Odour, fumes and vibration;
- g. Security; and
- h. The ability to feel at ease in home or garden.

For new housing development, the following will also be taken into account:

- a. Whether sufficient internal space is provided for future residents in accordance with the nationally described space standards;
- b. Whether sufficient external space is provided for future occupiers;
- c. Appropriate provision of storage space for household items, cycles and refuse; and
- d. Appropriate provision to enable working from home.



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

Vision – City of Culture

Addressing the need for economic growth and job creation links to the aim in the 2040 vision of creating a city of culture where creative making plays a leading role. Encouraging growth and investment in the creative industries will help build a living city where everyone thrives.

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 priorities of delivering a prosperous local economy and a net zero city.

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 where significant housing delivery attracts major business investment and high-value jobs. Whilst Exeter has, like all cities, been significantly affected by Covid-19, it is bouncing 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 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 (including Artificial Intelligence (AI)) in the health sector.
- **Digital innovation:** This includes high growth digital and AI 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.
- **Creative industries:** This is an innovative sector that has the ability to realise transformative change. Creative industries are set to become increasingly important to economic wellbeing as we become increasingly dependent on the generation of knowledge through human creativity and innovation. Exeter has long been a hub for creative makers and shakers and this is set to continue.
- **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 are spinoffs from the University of Exeter or other local bodies, new start-ups or inward investment by existing firms. Support could be in the form of education and training, through Building Greater Exeter, or through enabling new infrastructure such as a digital exchange and/or digital hubs.

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 (Strategic policy)

The 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;
- Creative industries; and
- Other emerging transformational sectors.

The City Council will work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, and improved education and training 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 (Strategic policy)

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 may be considered 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.

New forms of employment provision

- 6.9 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 SMEs (Small and Medium Enterprises) and traders. Incorporating work hubs, co-working, collaborative workspaces and live-work schemes into all large scale residential developments will ensure a truly liveable and sustainable cultural

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, encourage creativity and allow collaborative working.

- 6.10 It will also be important for all new homes to include home offices or at least to be designed in a way to facilitate home working. Policy H14: Residential amenity and healthy homes includes requirements on this.
- 6.11 Policy EJ3 supports new forms of employment provision and ensures delivery at large scale employment developments.

EJ3: New forms of employment provision (Strategic policy)

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 development will be supported:

- Work hubs;
- Collaborative workspace; and
- Appropriate live-work schemes.

Strategic brownfield development proposals 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

- 6.12 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. The City Council will work with regional and local partners such as the University of Exeter, Exeter College, and training providers to build skills and improve pathways to work for young people and disadvantaged groups. The City Council will also work closely with Building Greater Exeter, an initiative that aims to:
- Inspire new candidates and represent employers at engagement events;
 - Support employers by facilitating recruitment, up-skilling and re-skilling;
 - Deliver social value through employment and skills plans on major developments; and
 - Produce experiences promoting a culture that makes the built environment a great place to work.
- 6.13 Building Greater Exeter work with organisations, appointed contractors and the supply chain and are happy to support those bringing forward new development in the city.
- 6.14 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. To support 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 major developments using the Construction Industry Training Board (CITB) client based approach which is widely recognised within the industry. These plans contain targets for a range of employment, volunteering and development activities. This will help provide opportunities for local people to experience and join the future workforce.

6.16 Policy EJ4 supports work towards building skills and improving pathways to work for young people and disadvantaged groups.

EJ4: Access to jobs and skills

The City Council is committed to supporting access to employment and learning opportunities, social mobility, and city-wide inclusion. Development proposals will be supported when they 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); and
- 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.

Provision of local services in employment areas

6.17 The City Council recognises that many of the successful employment areas in Exeter would benefit from the provision of some local services which would otherwise be located in existing centres. This could assist the workforce, be attractive to inward investors seeking a suitable location and should also reduce the need to travel by car. Local services could include a child care nursery, a medical practice or walk-in centre, a dentist, a chemist, a post office, a bank, cash points, a sandwich bar or a small convenience store for top-up purchases (with retail floorspace not exceeding 500 square metres).

6.18 The acceptance of local services within the city's employment areas must not set a precedent for other uses. Planning permission should only be granted if it is demonstrated that the local service is not already suitably provided within the area. The service should meet local workforce needs only and not generate trips by people living or working outside the employment area and such services should be located within reasonable walking distance of the local workforce (which would normally be approximately 400 metres).

- 6.19 Policy EJ5 supports the provision of local services within employment areas for the benefit of the workforce. The employment area of Southernhay is excluded from the provisions of Policy EJ5, due to its close proximity to existing services in the city centre.

EJ5: Provision of local services in employment areas

Development proposals involving the provision of local services within the established employment areas at Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be permitted when:

- a. The service is designed to serve local workforce needs only;
- b. There is not sufficient provision to meet local workforce needs through existing services in the area;
- c. It would be located within reasonable walking distance of the local workforce, taking into account new or enhanced routes; and
- d. It would not harm the primary function of the area as a business park or industrial estate.

New transformational employment allocations

- 6.20 New employment sites are allocated in policy EJ6 to meet the specific requirements of the transformational sectors. Allocating sites which are suitable for transformational employment development can help remove barriers to delivery and act as a catalyst for further growth.
- 6.21 Along with the protection of the established employment areas and the provision of work hubs, collaborative workspace and live-work schemes within the strategic brownfield development sites, these transformational employment allocations will provide additional floorspace to help meet identified employment demand. Each site has its own characteristics which will impact on the form of development, the approach to delivery and the potential occupants.
- 6.22 The land adjacent to Sandy Park and the land adjacent to Ikea are both sites that are in accessible locations on the eastern side of the city close to Junction 30. The sites' accessibility will be attractive to speculative development for transformational uses and could provide accommodation for start-ups.
- 6.23 The Toby Carvery site is in a prominent and accessible location within close proximity to local amenities and public transport. As such it could provide a prestigious flagship site for a high profile occupant.
- 6.24 The St Luke's site forms part of the University of Exeter's campus and currently provides academic, administrative, sports and social facilities for the University of Exeter. The site will require redevelopment to provide a future health campus, to consolidate health and wellbeing activities and help the University to scale up its biomedical and clinical research and associated commercialisation. Redevelopment of the campus will also strengthen the existing research and teaching links between the University and the Royal Devon University Hospital. Proposals at St Luke's will need to be of a high quality and appropriate in the context of the wider residential area. Proposals will need to demonstrate through the preparation of a masterplan framework regard for the environmental and heritage assets on site and in the surrounding area.

6.25 Most transformational employment uses are within planning Use Class E: Commercial, Business and Service meaning they can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke soot, ash, dust or grit. The imposition of a 'gateway' requirement (enforced through condition or legal agreement) will be needed to limit the future use of new developments to those within a transformational sectors.

EJ6: New transformational employment allocations (Strategic policy)

The following sites are allocated for transformational employment development and associated infrastructure and will be retained for this purpose:

Site	Size of site
Land adjacent to Sandy Park, Newcourt	7 hectares
Land adjacent Ikea, Newcourt	4 hectares
Toby Carvery, Rydon Lane, Middlemoor	1.5 hectares
St Luke's Health Campus, Heavitree Road	4.5 hectares



7 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 priority of a prosperous local economy.

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 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 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 it 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 relatively low. This reflects Exeter's status as regional centre for a large surrounding area.
- 7.3 There are, however, opportunities to improve the city centre by providing a greater variety of uses, developing cultural activity, show-casing the historic environment further, bringing nature into the heart of the city, providing more public space, supporting markets and improving sustainable travel links. In taking these ideas forward, 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, that it is visited for longer periods of time throughout the day and night and that it is home to a wider variety of retail including independent shops. 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.

- 7.4 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, visit, shop, study and socialise. This work is reflected in the Exeter Plan.
- 7.5 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 providing appropriate venues and public spaces to enable culture to flourish. It will need to celebrate the historic environment and local character through the provision of high quality buildings and public spaces, ensuring that heritage assets, their settings and historic streetscapes are conserved and enhanced. It will need to diversify to 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

- 7.6 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. The district centres sit between the local centres and the city centre and provide a wide variety of facilities and services. The local centres are located across the city, are smaller and provide a more limited, yet vital, range of facilities and services.
- 7.7 A high-level review of the city's centres has been undertaken. This has resulted in a small number of additional local centres being identified. Some of the existing local centres have also been renamed to clarify their location. The revised list of district and local centres is set out below:

District centres

- Topsham
- Heavitree
- St. Thomas

Local centres

- Northern end of Sidwell Street / Blackboy Road
- Mount Pleasant
- Magdalen Road
- Topsham Road - Countess Wear
- Beacon Lane
- Polsloe Bridge
- Pinhoe
- Whipton
- Exwick
- Isleworth Road

Additional local centres identified:

- Alphington
- The Quay and Canal Basin
- Burnthouse Lane
- Topsham Road - St Leonard's
- Countess Wear

- 7.8 The strategic brownfield development sites such as Water Lane 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.
- 7.9 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.
- 7.10 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. Revisions to the planning Use Class Order made in 2020 grouped a much larger variety of commercial uses in Class E. Retail, food and drink, financial and professional services and various other commercial uses are now grouped together. Planning permission is not required for changes of use within the same use class. This means that many types of business user will be able to change the uses of properties without seeking planning permission.

Out of centre retail

- 7.11 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 played a role in reducing the success of city and town centres in a similar way to the growth of online shopping more recently. Out of centre 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. Finally, out of centre shopping can lead to challenging inequalities because of the potential to exclude those groups who cannot afford the costs of car travel.
- 7.12 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 strategic brownfield 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 and centres (Strategic policy)

The vitality, viability and resilience of the city centre, district centres and local centres will be protected, 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 and visitor 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 and increase footfall.

Development proposals for retail provision will be encouraged in the primary shopping area and supported elsewhere in the city centre and the district and local centres. Development proposals for commercial, residential, entertainment, leisure, cultural, tourism, hospitality, experiential, educational, health and employment uses, including temporary installations for stalls, markets and outdoor dining, will be supported in the city, district and local centres where there is robust evidence that they would:

- a. Provide a complementary mix of uses to support the retail function of those centres;
- b. Enhance the viability, vitality and resilience of those centres; and
- c. Protect and enhance the cultural, historic and natural environment of the centres.

Small scale comparison and convenience retail provision of up to 500 square metres sales floor area will be supported as part of a wider mix of uses at the strategic brownfield allocations. Small scale convenience retail provision of up to 500 square metres sales area will be supported at the other predominantly residential allocations.

Outside of the city centre, district centres, local centres and strategic brownfield development allocations proposals for town centre uses of more than 500 square metres will not be permitted unless the proposals meet the sequential test and, for retail and leisure developments, it can be clearly demonstrated in a robust impact assessment that the proposals will not have a negative impact on investment in, or the vitality and viability of, the city, district and local centres.



8 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 a net zero carbon city, a healthy and active city, housing and building great neighbourhoods and communities.

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 making improvements to our natural and historic 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, East Devon, Teignbridge Mid Devon District Councils, National Highways, Network Rail and bus operators to ensure we have consistent aspirations and approaches. This work with partners means that the content of the Exeter Plan, the Exeter Transport Strategy, the emerging Local Cycling and Walking Infrastructure Plan, the new Local Transport Plan, Bus Service Improvement plan and other plans are consistent. More specifically, a transport modelling process is currently being progressed by Devon County Council and National Highways to assess the transport impact of development in the wider area covering Exeter, East Devon, Teignbridge and Mid Devon. This will underpin a coordinated transport strategy for the Exeter catchment area with the city at its core.

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 provide services and facilities close to where people live, 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 which start and finish 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 (Strategic policy)

To help achieve a net zero city by 2030, to support the sustainable growth of Exeter and the wider area and to improve accessibility, health and the environmental quality of the city, the following outcomes will be sought from all relevant planning decisions and through joint working between the City Council, other Authorities and stakeholders:

- a. Delivering on the spatial strategy by supporting development in locations which reduce the need to travel, maximise walking, cycling and public transport for the majority of everyday journeys and support low-car development where appropriate;
- b. Providing for mixed-use development which enables communities to access most of their daily needs on foot from their home;
- c. 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;
- d. Achieving a reliable, low carbon, frequent and attractive standard of public transport within the city and to key destinations elsewhere throughout the day;
- e. Enhancing choices for all through new forms of car use by expanding shared mobility and requiring its provision in all major developments, significantly increasing provision for electric vehicles, supporting innovations including ticketing systems combining low emission modes and enabling the provision of mobility hubs;
- f. Supporting opportunities for sustainable water-borne transport;
- g. Protecting and enhancing the function of Exeter as a strategic rail, bus/coach, 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, depending on location, scale of development and the availability of sustainable modes of transport.
- 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. In addition, transport provision will need to play a key role in place-making.
- 8.11 There will be cases where local highway improvements are required. These may include widened vehicle access points, localised junction improvements, measures to improve safety and highway network resilience. There may also be a need to provide improvements to the trunk road network to ensure its safe and effective operation, as is required by the Government.

STC2: Active and sustainable travel in new developments (Strategic policy)

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 high quality provision for the following in sequential order:

- a. Active travel;
- b. Public transport and shared mobility;
- c. Electric vehicles;
- d. 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;
- e. 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.

Active travel proposals

- 8.12 The Exeter Transport Strategy includes an ambitious aim for 50% of trips which start and finish 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 become more attractive options.
- 8.13 Policy STC3 identifies a set of key proposals including the Exeter sections of long distance strategic trails. These reflect the importance of Exeter as the centre of a large travel to work area and the attractiveness of the city as a tourist destination. The Exe Estuary Trail linking Exeter with Dawlish and Exmouth, the Clyst Valley Trail between Exeter, villages to the east and Killerton and the emerging proposals for the Boniface Trail towards Crediton are important strategic trails for the city.
- 8.14 Policy STC3 also includes a list of important routes identified as priorities in Devon County Council's draft Local Cycling and Walking Infrastructure Plan. These routes should link to wider projects to improve the street scene and public spaces and also serve the strategic brownfield development allocations in the plan to play a key role in providing a significant improvements to the cross-city network of pedestrian and cycle routes, a vital part of the Exeter Transport Strategy.
- 8.15 It is 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 and waterborne transport. 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.
- 8.16 Beyond the large-scale active travel projects identified in policy STC3, smaller local measures are also important. The detailed design of cycle infrastructure in accordance with the government guidance LTN1/20, secure and enclosed cycle parking and drying spaces in buildings are all needed to widen the attractiveness of active travel. Travel planning will also be needed to support people in making sustainable transport choices as they move into new developments.
- 8.17 The design of developments themselves will also need to ensure that active travel is provided for comprehensively. Development should be designed at the outset to prioritise walking, cycling and scooting and minimise driving speeds in accordance with approaches set out in Manual for Streets and the Sport England Active Design Guidance. New development will also need to provide inclusive and accessible environments that take into account the needs of the whole community, including disadvantaged groups, those with disabilities and people with children and buggies. The Healthy Streets principles will play a role here and should be taken into account when designing new developments and delivering new transport infrastructure.
- 8.18 Looking more broadly, away from new development specifically, it is important to ensure that streets, footways and other walking routes are free of clutter to make walking a more attractive option. The City Council, alongside Devon County Council, has signed-up to the Clear Streets Charter to address issues caused by advertising boards, street furniture, charging points and bins and to promote engagement with people with visual impairments in the design of developments.

STC3: Supporting active travel (Strategic policy)

The City Council will work with other Authorities and stakeholders to create inclusive, coherent, direct, safe, comfortable and attractive active travel environments through place-making, enhancements to the public realm, street planting, improved air quality, use of water ways and the reduced dominance of cars in accordance with active design principles

The City Council will support the extension of a comprehensive active travel and public rights of way network including through improvements to:

- a. Long distance routes including the Clyst Valley Trail, the Boniface Trail, the Exe Cycle Route and Exe Estuary Trail;
- b. Routes included within the Exeter Local Cycling and Walking Infrastructure Plan and alongside waterways;
- c. Addressing severance challenges caused by the Strategic Road Network, the former Exeter bypass, key junctions, railway lines, the River Exe and the Exeter Ship Canal, without compromising safety; and
- d. City centre streets, including South Street, Fore Street, Paris Street, Queen Street, Sidwell Street and Barnfield Road, Routes to Heavitree High Street, Cowick Street Magdalen Road.

Development proposals will be required to provide high quality infrastructure, facilities and multi-modal parking to prioritise active travel for all.

Major development must:

- a. Be designed so early phases of development are as close as possible to existing active travel routes and make walking and cycling improvements; and
- b. Prioritise a dense and permeable network of coherent, direct, safe, comfortable and attractive active routes connecting into the wider active travel network.

All major developments and developments which result in an increase in one additional net dwelling must provide secure, enclosed parking/storage for cycles, electric bikes, cargo bikes, adapted cycles, electric scooters and push chairs. When provided centrally within a development, parking for active travel must be located in easily accessible locations with natural surveillance and high quality access to active travel routes. Parking to support active travel must be prioritised over car parking with the exception of disabled parking.

Showers and drying space must be provided in all employment and commercial developments of more than 0.5ha and in all cases, in developments employing more than 20 people.

Parking for active travel should be provided in accordance with the adopted Sustainable Transport SPD and any subsequent replacement.

Contributions will be sought towards new or improved active travel infrastructure in the city, in the early phases of development.

Public transport

- 8.19 In addition to active travel, public transport will be vital to provide a real alternative to using the car, particularly for areas on the edge of the city, where there are hills and for the elderly, families and the less mobile.
- 8.20 Compared to the surrounding rural areas, Exeter has a wider bus network with more frequent services, while the new bus station in the city centre has improved the passenger experience and vehicles have been upgraded. However, improvements to service reliability, frequencies, bus priority measures, the provision of electric vehicles and waiting infrastructure are all required to widen transport choices. Exeter also an important role as a hub for long distance coach travel with National Express, Falcon and Megabus all serving the city and wider area. This role should be safeguarded with improvements made to interchanges and stops while bus services to Exeter Airport should be enhanced. The City Council will work with Devon County Council to improve bus provision through the Bus Service Improvement Plan and through new development.
- 8.21 In addition to buses, Exeter benefits from an efficient and widespread rail network with two mainlines and two branch lines. There have also been considerable efforts to improve the network in recent years through high profile new stations at Newcourt and more recently at Marsh Barton. The network provides good rail access to many areas of the city, to the local area and national destinations. However, frequencies and station access require improvement while a new station at Monkerton is proposed alongside an enhancement to the gateway role of St David's station. The ongoing roll-out of the Devon Metro concept will continue to provide enhancements in future.
- 8.22 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.
- 8.23 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: Supporting public transport (Strategic policy)

The City Council will work with other Authorities and stakeholders to support inclusive, direct, frequent and reliable public transport.

The City Council will support bus and coach provision through service, infrastructure and vehicle improvements:

- 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, Alphington Road and Cowley Bridge Road;
- f. On the local and national coach network; and
- g. Serving Exeter Airport.

The City Council will support the enhancement of rail provision in the city:

- a. By safeguarding land for a railway station and associated enabling track and signalling infrastructure at Monkerton/Hill Barton;
- b. By 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; and
- d. By improving accessibility and level access at all stations.

The City Council will support multi-modal travel:

- a. by enabling park and ride and park and change provision serving the key radial routes accessing the city where appropriate;
- b. Through the delivery of 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; and
- c. Through the establishment of an integrated ticketing system for public transport and shared mobility.

Development proposals will be required to provide high quality and safe access to public transport.

Major development must:

- a. Provide densities, layouts and design which allow the provision of prioritised, frequent, reliable and attractive public transport services to, and where relevant, within, the site.

Development proposals of 100 homes or more and major commercial development must:

- a. Be located where high quality public transport is, or can be provided through developer contributions;
- b. Deliver appropriately located bus stops with raised kerbs for easy bus access, high quality shelters and real time information and, where appropriate, suitable routes for bus priority; and
- c. Provide new local multi-modal transport hubs and interchanges making best use of existing bus, rail and walking and cycling routes.

Contributions will be sought towards new or improved public transport services and/or infrastructure in the city, appropriately phased to most efficiently support the long-term future of the service.

Supporting new forms of car use

- 8.24 Whilst active travel and public transport will be prioritised and will play a vital role in helping to support development, achieving net zero, increasing health and wellbeing and creating great places, new forms of car use will retain a role for some people and for some journeys. Policy STC5 explains how new forms of car use will be supported.
- 8.25 The Government has committed to the end of sales of new petrol and diesel cars by 2030 meaning the number and importance of electric vehicles will significantly increase over time. Alongside the decarbonisation of the electricity grid, this evolution will reduce carbon emissions, improve air quality and reduce the impact of car use on in terms of noise. The provision of significant additional numbers of electric charging points and associated parking will therefore need to come forward quickly, including in new development.
- 8.26 Car use will also be part of an increase in shared mobility, where transport is shared among users who pay to have access to transport on a flexible basis. This could include car clubs and car sharing schemes or be combined with other systems such as bike hire. Car clubs can be used for less frequent trips and to complement sustainable transport. Development will support such car use by providing the necessary infrastructure and parking provision for shared mobility.
- 8.27 The spatial strategy within the Exeter Plan which focuses on strategic brownfield development sites close to the city centre, the provision of local services close to where people live and increased support for sustainable travel means that low car, and in some cases, no-car development will be supported where appropriate, particularly at the strategic brownfield development allocations. Applications at these sites will need to address this potential and also consider the potential parking implications for the nearby streets through controlled parking regimes.

STC5: Supporting new forms of car use

To manage the impact of car travel on the city, development will be required to make specific provision for new forms of car use including for electric vehicles and shared mobility.

Parking for electric vehicles with electric charging points must be provided in all major developments and developments which result in an increase in one additional net dwelling. Parking for car club vehicles must be provided at central locations in all major developments. Parking for electric vehicles and car club vehicles should be prioritised over parking for privately owned petrol and diesel cars in terms of the amount and location and should allow for a significant growth in the use of these vehicles.

Electric charging points should not be located where they would have a negative impact on the safety and functionality of the highway including footways, residential amenity or heritage assets and their setting.

Specific provision must be made in major developments for loading, unloading and deliveries.

Car parking should be integrated into the overall design of proposals to avoid a highway dominated layout and ensure high quality public realm.

Appropriate levels of car and motorcycle parking should be provided in the context of:

- a. The uses proposed;
- b. The location of development;
- c. The scale of development; and
- d. Availability of, and/or potential to improve, active travel, public transport and shared mobility.

Car parking should be provided in accordance with the adopted Sustainable Transport SPD and any subsequent replacement.

Car-free and low-car residential (including purpose built student accommodation and co-living), employment and commercial development will be supported in the city centre, at the strategic brownfield development sites and elsewhere when it is demonstrated to be acceptable by a transport statement and/or a transport assessment and travel plan, where appropriate provision is made for high quality active travel, public transport and shared mobility and where there are currently, or are proposals for, controlled parking zones.

Contributions towards the establishment of controlled parking zones will be required from major car-free and low-car residential development proposals where they are not already in place.

Travel plans

8.28 Travel plans are long-term management strategies for integrating proposals for sustainable travel into the planning process and new developments. People's travel behaviours can be influenced by facilities at their place of work and when they move house. The provision of information, opportunities and incentives to use active travel, public transport and shared mobility, provided through a travel plan, can deliver significant increases in these modes for comparatively low cost. Policy STC6 sets out the requirements in relation to travel plans.

8.29 Travel plans will usually be required at outline planning stage through a planning condition and will be supported by developer contributions.

STC6: Travel plans

All planning applications for major development proposals and/or developments proposals which would generate significant numbers of transport movements should be accompanied by a travel plan.

Travel plans will identify how the development will minimise car travel by considering:

- a. Development layout and the location of nearby facilities and services;
- b. Infrastructure and facilities to support sustainable transport;
- c. Multi-modal parking;
- d. Travel information;
- e. Incentives for using sustainable transport; and
- f. Monitoring, reviewing and reporting of the travel plan measures.

Travel plan measures should be delivered by the developer or through financial contributions to the Local Transport Authority.

Safeguarding transport infrastructure

- 8.30 The National Planning Policy Framework states that planning policies should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and support large development. On this basis, STC7 identifies land and structures which are needed to either facilitate sustainable transport or support the large development allocations proposed in the plan.

STC7: Safeguarding transport infrastructure (Strategic policy)

The following sites, routes and structures are safeguarded for future transport infrastructure:

- a. Land at Monkerton/Hill Barton on the Exeter to Exmouth branch line for a new railway station and associated access;
- b. The disused railway line, and land for associated access, at Marsh Barton for safe access and egress, active travel and flood risk adaptation;
- c. Railway arches and land at Tan Lane under the Great West Mainline for access to the Water Lane development;
- d. Underbridge of the Great West Mainline for active travel access to Water Lane and Marsh Barton;
- e. An additional railway arch under the Great West Mainline on Alphington Road for improved pedestrian and cycle access under the line;
- f. The embankment under the Exmouth Branchline on Sidmouth Road for improved pedestrian and cycle access under the line; and
- g. Land at Water Lane and in the Riverside Valley Park for an additional active travel crossing of the Exeter Ship Canal.

Development will not be supported where it would preclude the delivery of the transport infrastructure on the sites, routes and structures listed in this policy.

Motorway service area

- 8.31 The service area off Junction 30 of the M5 close to Sowton is strategic infrastructure for the wider area and is important in supporting the function of the trunk road network. In recent times the services have been improved, including through the opening of a large scale electric charging station.
- 8.32 However, the service area does not have dedicated slip roads from the motorway which means that vehicles have to navigate the local highway network for access. This plays a role in increasing congestion on the local highway network, particularly in the summer months as a result of holiday traffic. This has implications for trips from Exeter's large travel to work area and also in providing access to Sowton as a strategic employment area.
- 8.33 If an alternative service area could be provided close to Exeter, this would provide relief for the local highway network, providing significant benefits. As set out in policy STC8, the City Council would support the provision of an alternative service area close to the city if a site could be delivered. This would require significant discussion with Moto who run the services, Devon County Council, National Highways, East

Devon District Council, Teignbridge District Council and Mid Devon District Council whilst funding and securing the land needed would be significant challenges.

- 8.34 These challenges have informed the preparation of the Exeter Plan which no longer proposes to allocate the Liveable Exeter site known as Sandy Gate which included the motorway service area. However, the site would be appropriate in principle for employment provision and therefore if an alternative motorway service area could be delivered the City Council would support employment development at the site of the current services.

STC8: Motorway service area (Strategic policy)

Subject to the provision of an appropriate replacement, the City Council supports the principle of redeveloping the motorway service area at Moor Lane, adjacent to Junction 30 on the M5, for employment uses.

Digital communications

- 8.35 Digital communication goes hand in hand with transport provision; people increasingly access services, shopping and work online, reducing the need to travel. The Covid-19 pandemic accelerated this evolution which means that fast and reliable digital communications infrastructure is increasingly vital to support our communities and businesses.
- 8.36 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 STC9 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.
- 8.37 In making improvements to digital connectivity, it will be important to ensure that enhanced digital infrastructure is planned in a way which considers amenity and potential impacts on the natural and historic environment.

STC9: Digital communications (Strategic policy)

To facilitate economic growth, improve accessibility and achieve a net zero city by 2030, the City Council is committed to enabling a step-change in digital communications.

Development and infrastructure proposals that support the improvement of digital communications, including full fibre connectivity, digital exchanges and next generation mobile connectivity, will be supported when they would not have unacceptable impacts on the natural, built and historic environment.

All new residential, employment and commercial development will:

- a. Be required to have access to high-speed digital infrastructure; and
- b. Incorporate digital infrastructure as one of the essential utilities.

All large scale residential, employment and commercial development will:

- a. Incorporate digital infrastructure as one of the essential utilities, with routing and phasing planned comprehensively alongside the other utilities and identified within a utility connection plan;
- b. Where an appropriate organisation for its management is in place, 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; and
- c. Where appropriate management structures are in place, provide digital infrastructure ducting through a 'dig once' approach.

Sites of at least 500 dwellings or 5 hectares of employment will ensure resilience by providing at least two physically separate external connections points.



9 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 surrounding 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 surrounding 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.

Vision – City of Culture

Addressing the need to protect and enhance the natural environment links to the aim in the 2040 vision of creating a city of culture where the environment plays a leading role. Protecting the hills surrounding the city and the Valley Parks will ensure Exeter retains its cultural identity and will help build a city where everyone thrives.

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 a net zero carbon city, a healthy and active city, housing and building great neighbourhoods and communities.

Introduction

- 9.1 The city has a high quality natural environment, with Valley Parks and city parks, water bodies including the River Exe and the Exeter Ship Canal, and many public rights of way. The hills surrounding the city give Exeter a distinctive character and cultural identity, while the city also contains a rich variety of wildlife habitats.
- 9.2 The natural environment benefits from a significant, protective legal framework, including the Environmental Act 2021, that helps set the context for protecting and enhancing Exeter's environmental assets. The Exeter Plan seeks 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.
- 9.3 All designations, protected areas and sites mentioned in the policies below are shown on the Proposals Map.

Landscape setting

- 9.4 The planning system should enhance the natural and local environment by protecting and enhancing valued landscapes. The hills surrounding the city and the connected ridgelines give Exeter a distinctive character and cultural identity. The Valley Parks also contribute significantly to the city's landscape setting.
- 9.5 The 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 this land as a distinctive and valued landscape requiring protection from inappropriate development.
- 9.6 Policy NE1 provides protection to the landscape setting areas in the city shown on the Proposals Map. These areas include the sensitive areas to the north and west of the city and the Valley Parks. However, landscape is a strategic issue and our neighbouring authorities are also encouraged to recognise and protect Exeter's landscape setting.
- 9.7 Development within Exeter's landscape setting areas will be assessed against a series of criteria, including the distinctive characteristics, special features and qualities that make this valued landscape sensitive to development, as identified in the Exeter Landscape Sensitivity Assessment. Development should:
- 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 undermines 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 (Strategic policy)

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:

- a. There is no harm to the undeveloped character, natural beauty or quality of views enjoyed by people within the city; and
- b. There is no harm to the distinctive characteristics, special features and qualities that make this valued landscape sensitive to development, as identified in the Exeter Landscape Sensitivity Assessment;

or,

- c. It minimises harm to the Landscape Setting Area and is reasonably necessary for the purposes of:
 - Agriculture;
 - Forestry;
 - The rural economy;
 - Outdoor recreation;
 - Providing green infrastructure;
 - Landscape, education or biodiversity enhancement; or
 - Achieving net zero or delivering climate resilience.

or,

- d. 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

9.8 Exeter has nine Valley Parks (including two new Valley Parks proposed in the Exeter Plan) which provide informal recreation to the public and are also of significant wildlife value. The Exeter Valley Parks are:

- Ludwell Valley Park: This attractive area of undulating farmland is located between Wonford and Rydon Lane and is an 'island' of countryside surrounded by residential and office development. There are fine views from here across the city and down the Exe Estuary. There are pedestrian access points on all sides of the park.
- Riverside Valley Park: Stretching from Cowley Bridge to Topsham, this is the largest of the Valley Parks. The landscape character, and wildlife value, of the park alters significantly along its length, from grazing meadows in the north, through the busy Quay/Canal Basin area and then southwards to become part of the Exe Estuary Site of Special Scientific Interest. It is a popular informal recreational area that is accessible from many parts of Exeter and it forms a continuous wildlife corridor through the city.

- Mincinglake Valley Park: This 'finger' of countryside extends down from Stoke Hill between the residential areas of Mincinglake Road and Mile Lane. The lower valley is wooded whilst the upper part comprises meadows that are rich in wild flowers, butterflies and other insects. The park has a system of well laid out paths and there is easy access from adjacent residential areas.
- Alphington/Whitestone Valley Park: This western ridge-line of the city comprises some splendid 'rural' valleys and ridge-lines that offer excellent views of the city although access is restricted to footpaths, bridleways and lanes. Within the park is the Barley Valley Local Nature Reserve.
- Duryard Valley Park: A Valley Park to the north of the city. The mix of meadows and woodland here are host to a wide range of wildlife that thrives in the quiet valleys. All the roads within the estate are private but responsible walkers are not prevented from using them. The picnic site off Pennsylvania Road affords fine views across the Valley Park towards Dartmoor. Within the park is the Belvidere Meadows Local Nature Reserve.
- Hoopern Valley Park: This is the only area of natural open space in the St Davids/St James areas of Exeter. It comprises a steeply sided and partly wooded valley that is close to densely populated urban areas and the University of Exeter. It forms an important wildlife refuge and supports, amongst other species, deer, badgers, grass snakes, butterflies and a wide range of birds. There is scope for significant improvement to the habitats found there. Public access is currently limited to the public footpaths that run alongside and across the valley
- Savoy Hill: A relatively small Valley Park to the north of the city close to Beacon Heath. The northern portion comprises a large floristically rich meadow and the southern section is a partially wooded, narrow valley. For such a small area, the park is surprisingly rich in wildlife and the proximity of a large residential area makes the locality particularly valuable for informal recreation.
- Whitycombe Valley Park: A newly designated Valley Park proposed through the Exeter Plan, located on the northern edge of Exwick. The sites includes some pristine meadow and provides views across the city. Whilst small in size, the proximity of a large residential area make this area particularly well used for informal recreation.
- Northbrook Valley Park: A newly designated Valley Park proposed through the Exeter Plan. This former golf course creates a link between the two existing Valley Parks of Ludwell and Riverside and there is significant scope here for making improvements, for example through the Northbrook wild arboretum project. Designating this area as a Valley Park ensures it is retained for the city's residents to use for informal recreation.

9.9 Many of the Valley Parks (Ludwell, Riverside, Mincinglake, Whitycombe, parts of Duryard, and parts of Alphington/Whitestone) are 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.

9.10 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 as well as informal outdoor recreation. There may also be opportunities for land management interventions within the Valley Parks, particularly in the upper parts of catchments that could help mitigate flood risk and help with climate resilience. Policy NE2 seeks to protect the Valley Parks and only permit development that supports the functions of the Valley Parks.

NE2: Valley Parks (Strategic policy)

Within the Valley Parks only appropriate development which provides for the following functions will be supported:

- a. Outdoor recreation/Suitable Alternative Natural Greenspace;
- b. Nature conservation and ecological enhancement;
- c. Public access by active travel;
- d. Environmental education;
- e. Managing flood risk; or
- f. Achieving net zero or delivering climate resilience.

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.

Biodiversity

- 9.11 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, cultural identity, 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.
- 9.12 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 overriding public interest and compensation measures are secured.
- 9.13 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.

- 9.14 Other areas of particular biodiversity and geodiversity importance include Sites of Special Scientific Interest (SSSIs), County Wildlife Sites and Regionally Important Geological Sites (RIGS).
- 9.15 It is also important to protect and enhance the natural environment which is not designated, including sites of local biodiversity importance and priority habitats. Ecological survey work may be required to establish the potential impact of development on biodiversity.
- 9.16 Under the 2021 Environment Act there is a requirement to produce a Devon Local Nature Recovery Strategy (LNRS). Devon County Council is leading on this work which 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 started in 2022.
- 9.17 All development proposals will need to provide at least 10% measureable net gains in biodiversity, on site where possible but elsewhere if not, in line with the biodiversity mitigation hierarchy (which puts avoiding harm to biodiversity ahead of mitigating harm, with compensation as a last resort). The biodiversity net gain requirement is set out in the 2021 Environment Act and is due to be a legal requirement by the end of 2023.
- 9.18 Policy NE3 provides criteria to ensure all proposals follow the mitigation hierarchy and provide a net gain in biodiversity. In regard to delivering other biodiversity improvements on site, the Residential Design SPD provides helpful guidance, including in relation to bat and bird box provision.

NE3: Biodiversity (Strategic policy)

The City Council is committed to increasing biodiversity to reverse the decline in nature, help achieve net zero, improve the local environment, encourage cultural exchange 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 development proposal would have no adverse effects on the integrity of a site on the UK National Site Network (SPA or SAC) or internationally important site (Ramsar), 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) it will not be permitted unless the benefits of the development clearly outweigh both the impacts on the features of the site and any broader impacts on the national network of sites.

Development proposals that are 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 as important in the Local Nature Recovery Strategy, or a Regionally Important Geological Site) will only be permitted if:

- a. The need for, and benefits of, the development is sufficient to outweigh biodiversity and/or geological conservation considerations;

- b. It can be demonstrated that there is no suitable alternative site with less harmful impacts; and
- c. Damaging impacts are avoided or minimised and appropriate mitigation and compensatory measures are implemented.

All development proposals will be required to follow the mitigation hierarchy and where relevant:

- a. Take steps to avoid affecting protected species, and, in all cases, ensure that disturbance to wildlife is kept to a minimum;
- b. 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;
- c. Contribute towards measures to mitigate against adverse effects from recreational disturbance on the Exe Estuary SPA and other nearby sites on the UK National Site Network;
- d. Provide at least 10% (or the legally defined 'relevant percentage' if different) Biodiversity Net Gain in accordance with national and local guidance, to meet the Biodiversity Gain Objective, help deliver the Local Nature Recovery Strategy and to ensure a net biodiversity gain for the city; and
- e. Incorporate other features to buildings, gardens and open spaces to encourage biodiversity improvements.

Green infrastructure

- 9.19 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. Green infrastructure also allows for cultural and creative exchanges, while socialising opportunities help to bring communities together.
- 9.20 A Green Infrastructure Strategy has 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. Outside the city boundary, residents also enjoy access to other strategic areas of green infrastructure, including Haldon Forest, Poltimore House and the Killerton Estate, which forms part of the wider Clyst Valley Regional Park.
- 9.21 The Green Infrastructure Strategy provides guidance on specific projects as well as 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 Green Infrastructure Strategy is being undertaken as we move forward with the new Exeter Plan.
- 9.22 All development should protect existing green infrastructure and take opportunities to extend the sustainable transport network and provide steppingstones for wildlife in accordance with the updated Green Infrastructure Strategy. All new, large scale developments will also need to demonstrate that residents will have easy and

sustainable access to green infrastructure by walking and cycling. Where necessary, contributions will be sought to enhance and manage green infrastructure.

- 9.23 Policy NE4 seeks to ensure that development takes a positive approach to protection, enhancement and delivery of green infrastructure.

NE4: Green infrastructure (Strategic policy)

All development proposals will be required to protect existing and take opportunities to deliver new, green infrastructure in accordance with the updated Green Infrastructure Strategy.

All large scale residential development proposals will be required to submit a Green Infrastructure Plan setting out how the development will link to existing green infrastructure (including PROW, Valley Parks and the Exeter Green Circle) and demonstrating how the development will contribute to the delivery of the Green Infrastructure Strategy. Where necessary, contributions to enhance green infrastructure, sustainable transport links and gateway access points will be sought.

Green circle

- 9.24 The Exeter Green Circle is a twelve mile walk that provides a great walking experience within the boundaries of Exeter, from green countryside Valley Parks to the pavements of quiet leafy suburbs. This important green infrastructure asset provides access to nature-rich beautiful places and encourages active and healthy lives. Monitoring the usage of the Green Circle has proven its importance as a sustainable movement route that serves to connect communities, provides socialising opportunities and allows for cultural exchange. It is therefore important that development protects this important city asset.
- 9.25 Policy NE5 seeks to protect the Green Circle and restrict development that adversely affects its functions.

NE5: Green circle

The Green Circle will be protected as an important green infrastructure asset that links communities in a sustainable way whilst providing exercise, recreation and health benefits. Development proposals which adversely affect the function of the Green Circle, or its setting, will not normally be permitted.

Urban greening factor

- 9.26 The Exeter Plan proposes a significant amount of development on brownfield land. This increased densification of the city will be likely to put increased pressure on greenspaces, the natural environment and natural systems that make a fundamental contribution to the identity and liveability of places. The impact of climate change and the need to increase the resilience of urban areas will only place greater demands on these ecosystem services that manage surface water, improve air quality and cool peak summer temperatures.

- 9.27 In response to this, the City Council through policy NE6 is proposing to introduce a requirement for all major development to improve the provision of green infrastructure and increase the level of greening in urban environments. This will be achieved through the introduction of an Urban Greening Factor.
- 9.28 The Urban Greening Factor forms one of the five headline green infrastructure standards introduced in 2023 by Natural England as part of their Green Infrastructure Framework. It is a way of measuring the greenery proposed within planning applications for housing and employment, and encompasses all forms of vegetation, including trees, parks, gardens and roofs.
- 9.29 The Urban Greening Factor will provide significant benefits to cities and their residents, such as improved air quality, reduced heat island effect, and enhanced biodiversity. It will also be used alongside biodiversity net gain to help set the quantity and functionality of Green Infrastructure that should be delivered on-site.
- 9.30 To accompany the Urban Greening Factor, Natural England also released a spreadsheet and user guide for calculating it. The City Council proposes to use the latest version of this for implementing the Urban Greening Factor.
- 9.31 The Urban Greening Factor assessment should be submitted as part of the planning application, along with landscaping proposals and an operation and maintenance plan to show how the greenery will be maintained. This will ensure that suitable green elements are designed in and will remain attractive and viable throughout the life of the development.

NE6: Urban greening factor

Major development proposals must include the latest version of Natural England's Urban Greening Factor (UGF) calculator demonstrating how the development will achieve UGF scores of at least:

- a. 0.3 for predominately commercial development; and
- b. 0.4 for predominately residential development (or 0.5 for predominantly greenfield residential development).

An operation and maintenance plan must also be included which satisfactorily demonstrates that the green features will be successfully retained throughout the life of the building.

Urban tree canopy cover

- 9.32 Trees provide an enormous multifunctional benefit to people and wildlife, helping to improve our health, providing biodiversity habitats and recreational opportunities, preventing flooding, reducing the impact of climate change and improving air and water quality.
- 9.33 A 2018 assessment of the canopy cover for the city as a whole by UrbanTreeCoverOrg resulted in an estimated cover of 24.5%, which is higher than the UK national average (17%) for towns and cities.

- 9.34 The City Council has set a local target to increase this to 30% over the next 20 years. Alongside planting trees on land it owns, the City Council can also play an active role in meeting this target through planning policy.
- 9.35 Policy NE7 seeks to ensure that new developments contribute towards meeting this target. Applications should be accompanied by a Canopy Cover Assessment, measuring the existing level of tree canopy cover on-site, and setting out how the development will achieve a 5.5% uplift, based on the number of new trees planted once they reach maturity.
- 9.36 There may be circumstances e.g. related to design or viability, in which it may not be possible to deliver the trees on-site. In these instances, off-site provision of the additional trees will be acceptable.
- 9.37 The Devon Local Nature Partnership have published the 'Right Place Right Tree' guidance, which should be used when choosing the locations and species of new trees to be incorporated into schemes.

NE7: Urban tree canopy cover

To contribute towards the City Council achieving its target to increase tree canopy cover to 30%, all new streets must be tree-lined and major development proposals must increase tree canopy cover on-site by at least 5.5% when compared to the pre-development baseline.



10 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. Conserving 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: Conserve 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 thriving culture and heritage.

Introduction

10.1 Exeter's rich historic environment makes the city unique and special and continues to shape the city's culture and identity 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, as does climate change, but the Exeter Plan provides an opportunity to conserve 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 identity

- 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. Heritage-led regeneration and the 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, conserve, enhance and celebrate Exeter's past is crucial to its future.
- 10.4 The National Planning Policy Framework explains that heritage interest may be archaeological, architectural, artistic or historic. This wide definition provides the context for how the Exeter Plan considers the historic environment.

Types of heritage asset

- 10.5 All heritage assets are finite resources that cannot be replaced. Scheduled monuments, listed buildings, conservation areas, and registered parks and gardens are designated heritage assets. Designated heritage assets are protected by law under the Planning (Listed Building & Conservation Areas) Act 1990 and underpinned by Government policy in the National Planning Policy Framework. There are also non-designated heritage assets that are identified locally. These include buried remains, buildings, monuments, specific sites, places, areas or landscapes identified as having a degree of heritage significance meriting consideration in planning decisions. These are identified in Exeter's List of Locally Important Heritage Assets, Conservation Area Appraisals and Management Plans, and the Exeter City Historic Environment Record (HER). Non-designated heritage assets may also be identified as part of the planning application decision-making process, for example, following archaeological investigations.
- 10.6 Listed buildings are designated by Historic England using nationally set criteria. They 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. Alterations or extensions to a listed building that affect the significance, character or appearance, or demolish all or part of a listed building require Listed Building Consent to be applied for. This is separate to planning permission and Listed Building Consent may still be required in cases when planning permission is not. Carrying out unauthorised works to a listed building without first obtaining consent from the local planning authority is a criminal offence.
- 10.7 Conservation Areas are designated heritage assets and 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.
- 10.8 The character and appearance of Nationally Registered Parks and Gardens must be conserved, enhanced where possible, and sensitively managed. The significance of these designated heritage assets is a planning consideration when determining applications.
- 10.9 Exeter contains several nationally important archaeological sites which are designated as scheduled monuments, including the Exeter City Walls, and are protected by law under the Ancient Monuments and Archaeological Areas Act 1979. Separate consent is required for works to scheduled monuments.
- 10.10 Exeter possesses a rich legacy of above and below ground archaeological remains and these contribute to the cultural, tourist and economic attraction of the city. Not all important remains or buildings are scheduled monuments, listed, or located within the designated Area of Archaeological Importance (AAI), one of only five such areas in England and Wales. The Historic Environment Record (HER) is a useful indicator of archaeological potential in the city and the City Council's Archaeology and Development Supplementary Planning Guidance and Historic England's Advice Note 17 on planning and archaeology provide further information on this topic.
- 10.11 Where development has the potential to adversely affect previously undiscovered heritage assets, the results of archaeological investigations may need to be

submitted with application in order to provide sufficient information for determination. The City Council will assign a level of significance to that asset which will inform any mitigation required. The quality and significance of Exeter's archaeological deposits are such that preservation in situ may be the only appropriate mitigation.

- 10.12 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.
- 10.13 In terms of the condition of heritage assets, Historic England updates the Heritage at Risk Register annually to help understand the overall state of England's historic sites. The programme identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development and most in need of safeguarding for the future.
- 10.14 The City Council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and a willingness to consider positively those development schemes that would ensure the repair and maintenance of the asset.
- 10.15 The City Council works with relevant stakeholders to encourage better understanding of the heritage assets on the 'at risk register'. Where appropriate the City Council will encourage heritage partnership agreements, particularly for Listed Buildings on any 'at risk' register.

Development affecting heritage assets

- 10.16 Heritage-led regeneration and the positive role Exeter's heritage plays in local identity is a key factor in development. It is important that the potential impacts on all heritage assets and their settings, whether designated or non-designated, are considered through the planning process. The National Planning Policy Framework is clear that when considering the impact of a proposed development on the significance of a heritage asset, great weight should be afforded to the conservation of heritage assets with the weight linked to their importance regardless of the level of potential harm or loss resulting from proposals. When devising development proposals affecting heritage assets, Historic England has an extensive range of guidance and technical advice on looking after historic buildings and sites, climate change adaptation, retrofit and energy efficiency, recording and project management.
- 10.17 All planning applications affecting heritage assets or their settings must include a heritage statement describing the significance of the heritage asset and/or their settings, and assessing the impacts of the proposed development upon them. The level of detail should be proportionate to the asset's importance, and this assessment should be used to inform and explain the design concept.
- 10.18 All planning applications affecting heritage assets must be considered in terms of the impact of the proposal on the significance of the heritage asset. 'Significance' in terms of heritage-related planning policy is defined in the National Planning Policy Framework glossary as 'the value of a heritage asset to this and future generations because of its heritage interest'. Significance derives not only from a heritage asset's physical presence, but also from its settings.

- 10.19 All heritage assets have settings, defined in the National Planning Policy Framework as the surroundings in which a heritage asset is experienced. The extent and importance of settings are not fixed and may change as the asset and its surroundings evolve. A thorough assessment of the impact on settings needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 10.20 Policy HH1 sets out the key heritage considerations for development in Exeter. When considering the impact of development on heritage, the priority is to retain, re-use and enhance heritage assets with great weight afforded to the conservation of heritage assets, and weight linked to the importance of the heritage asset. Where it is not possible to retain the assets, or where there are substantial public benefits that outweigh the loss (wholly or in part), appropriate mitigation will be required and this could include recording, analysis, reporting and archiving of the significance of the asset. This must be agreed with the City Council as the local planning authority in advance of development commencing on site. Advice and guidance can be sought from the City Council and Historic England.
- 10.21 Policy HH1 also outlines the different considerations for development to take into account depending on whether the heritage asset affected by a development proposal is designated or non-designated, and in the case of designated heritage assets, whether the harm is substantial or less than substantial.
- 10.22 Whether a proposal causes substantial harm or less than substantial harm will be a judgment for the decision-maker having regard to the circumstances of the case and the policy. In general terms, substantial harm is determined by considering the degree of harm to the asset's significance and its special architectural or historic interest. The harm may arise from works to the asset or from development within its setting.
- 10.23 When considering whether the public benefits of a development are substantial or outweigh the less than substantial harm, they should be of a nature or a scale to be of benefit to the public at large and could be anything that delivers economic, social or environmental objectives. Public benefits do not always have to be visible or accessible to the public in order to be genuine, for example, works which secure an asset's future as a designated heritage asset could be a public benefit.
- 10.24 In addition to protecting and enhancing heritage assets, consideration will need to be given to whether development can improve public access to and interpretation of the asset. Development should weave heritage assets into green infrastructure and high quality public spaces in order to enhance public enjoyment of the historic environment.
- 10.25 Planning obligations could be used, where appropriate, to secure improvements to, and the mitigation of, adverse impacts on the historic environment. This could be provided through archaeological investigations, access and interpretation, and the repair and reuse of heritage at risk buildings or other heritage assets.

HH1: Conserving and enhancing heritage assets (Strategic policy)

Exeter's iconic and ancient heritage will continue to make an essential contribution to the liveability, culture, economy and tourism offer of the city. Development proposals will be required to conserve and where appropriate enhance Exeter's rich heritage and to ensure where possible that development makes a positive contribution to the historic environment and the cultural offering and identity of the city.

Development proposals that affect designated heritage assets, and/or their settings will only be supported when they conserve and where appropriate, enhance or reveal, the significance of the asset in the form of fabric, settings, character or appearance, and any features of special architectural, historic or archaeological interest.

Development proposals that would result in substantial harm to, or loss of, a designated heritage asset will not be permitted unless there is clear, convincing and demonstrable justification that they are necessary to achieve substantial public benefits that outweigh the harm or loss. Where development proposals would result in less than substantial harm to the significance of a designated heritage asset, the public benefits must demonstrably justify and outweigh the harm.

Development proposals that result in harm to the significance of a non-designated heritage asset will only be permitted where it is demonstrated that this is justified by the public benefits of the proposals in the context of the significance of the heritage asset and its settings and the scale of any harm.

The total loss of any heritage asset should be avoided. The loss (wholly or in part) of a heritage asset, whether designated or non-designated, will require appropriate mitigation including recording, analysis, reporting and archiving of the significance of the heritage asset. This will be undertaken by an appropriately qualified person or organisation in accordance with a scheme of works to be agreed with the City Council before commencement of development. All reporting will be made publicly available within an agreed time.

Heritage assets and climate change

- 10.26 In order to ensure the future of our heritage assets and to sustain this cultural heritage for future generations, they need to be adaptable to, and protected from, the effects of climate change. Historic buildings can also positively contribute towards reducing carbon emissions through sensitive and sympathetic adaptations that secure their retention, repair, retrofit and re-use alongside conservation of the significance of the heritage asset. The embodied energy (the energy used within the materials and construction activities) in historic buildings means that their retention aligns with the ambition to reduce carbon emissions and the priority to conserve heritage assets.
- 10.27 Addressing and adapting to climate change may require alterations to historic buildings or development that affects heritage assets, including their settings. This could include development or retrofit to ensure the building's retention or reduce carbon emissions, energy generation, or protection from flooding. A holistic view should be taken when considering such alterations. This should balance the need to

safeguard the future of the asset and the conservation, and where appropriate, enhancement, of its significance and historic and architectural qualities. Alterations to listed buildings should improve energy efficiency, reduce emissions and / or 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 HH2.

- 10.28 Historic England offers information and advice on many related topics including energy efficiency and historic buildings, conserving their significance and avoiding maladaptation.

HH2: Heritage assets and climate change (Strategic policy)

Development proposals that contribute to addressing climate change and affect heritage assets will only be supported where the changes minimise harm and are sympathetic and consistent with the design and significance of the heritage asset and its settings.

Development proposals that result in any degree of harm to a heritage asset will only be permitted where the contribution to addressing climate change demonstrably outweighs the harm to the heritage asset.

Conserving and enhancing the Exeter City Walls

- 10.29 The Exeter City Walls are designated as a scheduled monument, legally protected due to their national historical importance. Around 70% of the circuit remains intact delineating the origin of the city. The Walls became subsumed by modernity as the city expanded and faced 20th century transport infrastructure demands. The challenge lies in re-energising and re-imagining the significance of the Exeter City Walls and all they symbolise into a sustainable future city and to celebrate the individuality of the inherited city.
- 10.30 The Exeter City Walls play an important role in defining the historic city and contributing to the social, cultural and economic life of the City. Its presence on the national Heritage at Risk Register highlights its vulnerability and priority for safeguarding. Its designation offers the Walls a high degree of protection setting the precedent that development proposals that cause loss, substantial harm or restrict public access to the Walls will not be permitted.
- 10.31 The City Council will seek ways to secure funding to support a programme of works to conserve, repair, maintain and enhance the Exeter City Walls and improve public access and visibility of the Walls to celebrate their presence and meaning. This may include planning obligations to secure improvements and mitigate adverse impacts on the historic environment.
- 10.32 Policy HH3 recognises the importance the Exeter City Walls scheduled monument to Exeter and sets out intention to seek ways to secure funding to support a programme of works to conserve and enhance the Walls.

HH3: Conserving and enhancing Exeter City Walls

The Exeter City Walls play an important role in defining the historic city, contribute to the social, cultural and economic life of the city, and as a Scheduled Monument, are legally protected due to their national historic importance. Development proposals that cause harm or restrict public access to the Exeter City Walls will not be permitted.

Development proposals will be required to conserve and enhance the fabric and settings of the Exeter City Walls and to demonstrate, where feasible, that they improve public access, understanding and visibility of the Exeter City Walls. Contributions towards the repair, maintenance and enhancement of the Exeter City Walls will be sought where necessary.



11 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 thriving culture and heritage.

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 and further drive the identity and attraction of the city.
- 11.2 The Exeter Plan provides for the exploration and celebration of the cultures of the city and our communities as they evolve. The cultural offering of the city will be important to support the spatial strategy and the delivery of brownfield development. Urban living offers a cultural dynamic that is not seen elsewhere locally. Through working in collaboration with delivery partners on other initiatives such as the Cultural Compact, Exeter Cultural Strategy, the Creative Arc, Live and Move (the Sport England Local Delivery Pilot), the UNESCO City of Literature designation, and the Public Art Strategy, the Exeter Plan will provide opportunities for engagement with literature, creativity, the environment and physical activity in seeking to enhance the city's tourist and cultural offering. 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 Cultural richness includes anything that relates to how people live. Heritage, recreation, sport, art, literature, music, the natural environment and religion interlock as part of the culture of Exeter, shaping the city's identity and character and contributing to the city's economy, prosperity and tourism offer, 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, identified through Liveable Exeter

Principle 7: Connected Culture. The Exeter Plan will support high quality cultural place-making projects in the public realm and community facilities and deliver engaging and active places and spaces.

- 11.4 Cultural activity acts as a community and civic connector, 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. The Exeter Plan will support the creation of resilient, adaptable, networked communities and centres that support civic pride and local identity.
- 11.5 Exeter's heritage, cultural sector, education and science 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. Culture will help to drive investment, and high quality sustainable place-making across the city, drawing communities together to collaborate. Exeter has established a Cultural Compact with support from Arts Council England. This Compact puts value and the importance of the arts at the centre of Exeter's future.
- 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 partnership programme called Creative Arc to create new ideas and projects to address big societal challenges.
- 11.7 The Creative Arc is a cultural collaboration 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 promotes 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. The City Council and Exeter Culture together with the community-based arts organisation, Artwork Exeter, have created a Public Art Strategy seeking to make the most of future art opportunities in a growing 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 active, distinctive and special and that public art is a powerful tool in regenerating and celebrating our city.
- 11.9 The Public Art Strategy will be a reference point for the requirements of large scale residential, employment and commercial developments regarding design and public spaces, 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. Alongside policy IC3 which seeks to protect community facilities, Policy C1 sets out to protect facilities that are vital to tourism and the cultural life of the city. Policy C1 also seeks to support development that enhances the profile of Exeter as a city of culture. Examples of these facilities and bodies which are vital to the city's culture and contribute to the city's tourism offer include:

- The Royal Albert Memorial Museum and its archives;
- The University of Exeter and Exeter College;
- Exeter's theatres: Northcott, Barnfield and Cygnet;
- The Corn Exchange;
- The Phoenix Centre;
- Central Library and other libraries including the Westcountry Studies Library and Devon Heritage Centre;
- The Cathedral as the heart of the historic city;
- The historic quayside, canal and the River Exe and the estuary;
- A host of places of worship for a variety of religions;
- The Underground Passages;
- The Custom House;
- Roman and medieval remains including the Exeter City Walls;
- The Devon and Exeter Institution;
- Tuckers Hall;
- St Nicholas Priory;
- Exeter City Football Club;
- Exeter Chiefs Rugby Club; and
- An array of community buildings and facilities serving diverse groups and purposes.

11.11 It will be vital to retain viable cultural, sporting 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 and promote public access to such 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, evidence will be required and 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.

11.13 In line with Liveable Exeter Principle 7: Connected Culture, appropriate temporary or meanwhile uses of vacant buildings and public spaces for creative or cultural activities will be supported where local amenity will not be harmed. This could occur when sites are being developed. Development proposals should be progressed through engaging local communities in ensuring that local identity and culture are represented.

C1: Protecting and enhancing cultural and tourism facilities (Strategic policy)

Existing cultural and tourism uses will be protected unless it is demonstrated that they are no longer viable.

Development proposals that enhance the profile and identity of Exeter as a city of culture and tourist destination will be supported where they do not have unacceptable impacts on local amenity and the quality of the natural, built and historic environment.

The temporary use of sites for cultural activities, particularly in locations where they can help to animate the public realm, will be supported where they will not harm local amenity.

Development and cultural provision

11.14 Policy C2 outlines that large scale development proposals will be expected to reflect local culture and provide high quality, creative public spaces, cultural projects and public art proportionally to the scale of development.

11.15 Large scale development proposals 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. Opportunities should be provided as part of mixed-use developments and may also include appropriate cultural and creative meanwhile-uses of buildings or spaces during development.

11.16 Policy C2 also outlines that developers should engage with local communities in the process of identifying the development's contribution to local cultural provision. The City Council will also support formal and informal arts and cultural activities within shared spaces.

C2: Development and cultural provision (Strategic policy)

All large scale development proposals will be required to demonstrate how they will contribute to local cultural provision in proportion to the scale of development.

Developers should engage with local communities to ensure this provision reflects local identity.



12 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 a net zero carbon city, a healthy and active city, housing and building great neighbourhoods and communities and thriving culture and heritage.

Introduction

- 12.1 The quality of the places in which we live, work and visit is fundamental for so many reasons, including to support our health and wellbeing, 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 optimal densities appropriate to local characteristics 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 elsewhere in the Exeter Plan.

- 12.3 Building on the spatial strategy, the Liveable Exeter principles provide more detailed concepts which will ensure that the strategic brownfield 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 the strategic brownfield developments have been developed into a series of further design principles which should apply to all developments, requiring high quality development across the board. Design codes and other guidance, produced and adopted by the City Council will also play a key role in achieving this aim.

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 heritage 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 heritage significance in the future.
- 12.8 The Exeter Plan spatial strategy sets out that that the majority of residential development will be undertaken on strategic brownfield sites. In order to accommodate our housing needs, there is an expectation that development on these large sites will be undertaken at a higher density than what may have been present beforehand. Considerable care must be given to the design of these schemes to ensure that they are not overbearing in nature, particularly where the built form of surrounding areas are of lower density.
- 12.9 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 (Strategic policy)

To promote high quality design, development proposals will be supported where they:

- a. Create high quality distinctive places;
- b. Ensure that the location, layout and built form complement the surroundings;
- c. Include a robust and long lasting landscape framework which takes advantage of existing landscape features;
- d. Contribute to the provision of a compatible mix of uses which work well together to create vital and viable places;
- e. Retain and refurbish existing buildings of good townscape and historic value;
- f. Integrate measures to address climate change in ways which contribute to the character and appearance of the proposals;
- g. Create or maintain a high quality public realm and make provision, where appropriate, for public art and cultural activity as an integral part of the design;
- h. Are designed to be inclusive for all groups;
- i. Ensure that the scale, massing and height of buildings and other structures relate well to the site and its surroundings;
- j. Adopt contemporary and innovative design solutions, where appropriate;
- k. Are visually attractive as a result of high quality architectural detailing and landscaping;
- l. Use high quality materials which relate well to materials in the locality;
- m. Are sympathetic to local character and the historic environment;
- n. Retain and protects existing trees of good arboricultural and amenity value;
- o. Include native trees in appropriate locations, including on-street; and
- p. Integrate all service, utility, extraction systems and refuse facilities so that they complement the scheme.

All development must be undertaken in accordance with the relevant principles outlined in any adopted design-related SPD and/or design code.

12.10 In addition to planning applications for regular types of development, the City Council also has responsibility for making decisions on applications for advertisements. This process is managed through a specific set of national regulations for advertisement consent which are slightly separate from the regular planning process.

12.11 National regulations state that there are only two considerations for making decisions on advertisement consent applications:

- The effect on amenity; and
- Public safety.

12.12 This narrow set of considerations does not enable restrictions to be placed on what is being advertised through the planning process. This is a matter for the Advertising Standards Authority.

12.13 Policy D2 sets out the more detailed matters relating to amenity and public safety which can be considered when making decisions relating to applications for advertisement consent. As with the other design policy in the plan this will play a role in promoting high quality places in the context of an assessment of a proposal's local

impact. In some cases, the consideration of amenity and public safety will be quite separate. In other cases, including in relation to the need to avoid street clutter, amenity and public safety will be closely related.

D2: Advertisements

Proposals for advertisements will be supported where individually and cumulatively they would not harm amenity or public safety taking account of:

- a. The positioning, scale, materials, colour and lighting of the proposal;
- b. The character and historic, architectural and cultural significance of buildings, their settings and the wider area;
- c. The safety and functionality of the highway and wider transport network; or
- d. The safe operation of any security and surveillances systems.

Digital advertising installations should generate on-site renewable energy where possible.



13 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 a healthy and active city, a net zero carbon city and housing and building great neighbourhoods and communities.

Introduction

- 13.1 Generally, Exeter has 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. A broad range of health facilities including the Royal Devon and Exeter Hospital and multiple GP surgeries provide access to healthcare across the city. All these factors support health and wellbeing.
- 13.2 The picture of health and wellbeing is not the same across the city. 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% of trips starting and finishing in the city to be on foot or by bike, 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. Devon County Council have produced a Joint Health and Wellbeing Strategy which discusses the importance of new development in addressing these issues.

- 13.5 On a national level, the Town and Country Planning Association have also launched a campaign that seeks to improve the quality of new houses coming forward in England called 'Healthy Homes'. This seeks to introduce 11 healthy homes principles that all new homes should meet. A Healthy Homes Bill is currently making its way through Parliament, which if passed into law would place additional responsibilities on Local Planning Authorities to have regard to the healthy homes principles. In the interim, we have sought to address the need for healthy homes in the policies proposed in the Exeter Plan, including this chapter.
- 13.6 Policy HW1 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.
- 13.7 More details on the key requirements to be considered through the development process are provided below.
- 13.8 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;
 - Enabling good access by active travel and public transport; and
 - Providing places and buildings which are accessible to all, in particular those with protected characteristics.
- 13.9 Development should encourage healthy neighbourhoods by:
- Avoiding an over-concentration of hot-food takeaways, particularly along routes to schools;
 - Providing allotments where demand exists; and
 - Delivering a range of employment premises to support a mix of jobs and encourage independent stores.
- 13.10 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; and
 - Encouraging walking and cycling away from main traffic routes.
- 13.11 Development should have a positive impact 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 ensuring existing sources do not negatively affect residents;

- Ensuring dust, noise, smoke, light and odours emitted during building works are controlled;
- Ensuring that new homes provide year-round thermal comfort for inhabitants; and
- Including features to mitigate the impact of climate change, especially those providing for urban cooling in the face of rising summer temperatures.

13.12 Development should ensure safety and wellbeing by:

- Including appropriate layouts for roads and public spaces that prioritise walking and cycling, manage driving speeds and reduce conflict between road users; and
- Utilising principles to design out crime, including layouts that provide active frontages and passive surveillance.

HW1: Health and wellbeing (Strategic policy)

Development proposals should maximise opportunities for achieving positive mental and physical health outcomes. All large scale residential development proposals should be accompanied by a Health Impact Assessment demonstrating how the proposal will:

- Promote community inclusion;
- Encourage healthy neighbourhoods;
- Promote active lifestyles;
- Have a positive impact on health and wellbeing; and
- Promote safety.

Where any potential adverse health and wellbeing impacts are identified, the applicant will be expected to demonstrate how these will be mitigated.

Contributions towards improved GP provision will be sought where necessary.

Development proposals for new healthcare facilities will be supported where they are easily accessible by public transport and link effectively to walking and cycling routes.

Development proposals for the multi-use and co-location of healthcare provision with other services and facilities to support the convenient coordination of local care will be supported.

Pollution and contaminated land

13.13 Development has the potential to result in pollution to air, water or land either through release of pollutants during construction or operation, or by disturbance and mobilisation of historical contamination. Development can also be adversely affected by existing pollution. It is important to ensure that all development takes appropriate steps to minimise the risks of creating new sources of contamination and mitigates the risks from historical contamination where necessary. Developers must therefore consider the potential effects of pollution on human health and safety, the environment and the amenity of adjacent or nearby land users. Environmental health legislation provides a means to regulate many forms of pollution should it arise, but it is clearly preferable to ensure new development is appropriate for its location and hence prevent conflict arising in the first place.

- 13.14 Air quality in Exeter is generally good, but monitoring of nitrogen dioxide has resulted in the designation of an Air Quality Management Area (AQMA) along some of the major roads. The City Council has produced an Air Quality Action Plan, which proposes a series of measures to tackle these issues, and development will need to ensure it supports and will not be detrimental to delivery of this plan. The effects of development (including cumulative impacts) and existing pollution levels should be taken into account when deciding whether new development is appropriate for its location. Air pollution includes odour and both existing and potential new sources of odour (such as kitchen extraction systems) will be a material consideration when determining planning applications.
- 13.15 Exeter is crossed by a number of water courses and the area is also underlain by rock formations designated by the Environment Agency as principal and secondary aquifers. These aquifers contain potable groundwater which also flows into watercourses. Therefore there is the potential for development to affect the quality or quantity of water in rivers and aquifers and thus affect water dependant habitats and private water supplies. New development must not have an adverse impact upon water quality (for example by an increase in sewage effluent discharge) or water quantity (for example by preventing recharge to aquifers). The City Council will support initiatives that result in an improvement to water quality (as required by the Water Framework Directive). Policy CC9 also considers water quantity and quality.
- 13.16 Light and noise pollution arising from new development or affecting new development can individually and cumulatively have a damaging impact upon people's health, living environments and wildlife. Whilst lighting is desirable for safety, recreation and the enhancement of some buildings, inappropriate lighting can cause sky-glow, nuisance, light trespass and it also wastes energy. Inappropriate levels of noise can affect people's use and enjoyment of their homes, their ability to work or learn and their health.
- 13.17 Land contamination from former uses is also a key consideration as it has the potential to cause harm to the environment and public health and safety. Unless dealt with appropriately, it can inhibit the re-use of otherwise suitable sites and cause property blight. It is important that potential contamination is identified early to ensure that appropriate remediation measures are incorporated into the scheme. Remediation should remove unacceptable risk and make the site suitable for its new use. Additional advice for developers on the process for assessing contaminated sites and information on remediation works is set out in the City Council's Contaminated Land Strategy. As explained in this Strategy, voluntary remediation (particularly through development) will be encouraged as a means of dealing with any contamination legacy.
- 13.18 The City Council encourages pre-application discussions where pollution is or might be an issue. All applications for development must contain sufficient information to enable the City Council to make a full assessment of potential pollution and hazards. Development proposals on land affected by contamination (or where there is reason to suspect contamination) must include an assessment of the extent of the contamination and any possible risks.
- 13.19 Developers need to demonstrate prior to determination that it is technically and economically viable to resolve any issues and that the resulting development will have, or will result in, a satisfactory standard of amenity and that no unacceptable risks to human health or the environment will remain. This will need to involve adequate assessment by a competent person.

13.20 Activities (including traffic) during the construction and operational phases of development can also have adverse impacts and it may be necessary to submit a Construction and Environmental Management Plan (CEMP). For certain types of development an Environmental Impact Assessment (EIA) will be required to ensure that the environmental impacts are comprehensively considered.

13.21 Policy HW2 requires development proposals to mitigate and reduce adverse pollution resulting from construction and operational phases of development, and to ensure contaminated land is suitable for the proposed use.

HW2: Pollution and contaminated land

All development proposals should be designed, constructed and operated to mitigate and reduce to a minimum potential adverse impacts resulting from emissions and light, dust, vibration and noise pollution, and where possible, contribute to the improvement of local environmental conditions. This includes the construction and operational phases of development.

Development proposals will only be permitted where, individually and cumulatively, taking account of proposed mitigation, remediation and an assessment of future monitoring, there are no unacceptable impacts on:

- a. Air quality;
- b. Noise levels;
- c. Surface and ground water quality;
- d. Local environmental quality;
- e. Amenity; and
- f. Land and soil condition.

Development proposals on land affected by contamination, pollution or in areas affected by poor standards of amenity will only be permitted where it can be demonstrated that:

- a. Any unacceptable adverse impacts on future occupants are avoided; and
- b. The development will not place unreasonable restrictions on the future operation of existing businesses.

Proposals on land affected by contamination will only be permitted where the land is, or can be made, suitable for the proposed use.



14 Infrastructure and 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 a prosperous local economy, a healthy and active city, housing and building great neighbourhoods and a net zero carbon city.

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 healthcare, 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. Working with key infrastructure partners will be vital to ensure that infrastructure needs can be met in this way. The City Council will continue discussions relating to cross-boundary infrastructure provision in the context of the development planned in Exeter but also close to the city in East Devon and Teignbridge and also Mid Devon. Work with the other District Councils and Devon County Council will be particularly important here.

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 initial draft of an infrastructure delivery plan lists the infrastructure required to go alongside the developments identified in the 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 in phases when new homes are built and used to fund future infrastructure projects. The City Council produces an Annual Infrastructure Funding Statement which sets out the general direction of travel for the types of

projects which could be funded by CIL (without providing specific commitments). A review of the CIL rates in Exeter has been completed with new rates due to be implemented in 2024. This review of charges will ensure that development continues to be viable but also that CIL can still play an important role in funding infrastructure.

- 14.6 Section 106 agreements are negotiated on a case by case basis for large development proposals and secure development-specific funding for infrastructure and housing projects directly related to the specific development. Section 106 agreements are commonly used to provide funding to, or the direct provision of, affordable housing, local transport improvements, education projects, open space/green infrastructure, community facilities, flood risk mitigation and GP surgeries. Other provision can be made, for example for historic environment projects where there is a clear and robust evidence base, a direct link to development and where the requirements of national planning policy are met. It should be noted that all Section 106 agreements are subject to viability considerations and so there is limit to the amount of funding which development can contribute. More information on this is provided later in this section.
- 14.7 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. These arrangements are subject to external processes and decision-making and so collaboration is important to ensure that strategic infrastructure priorities are identified and funding opportunities maximised.
- 14.8 In most cases infrastructure will be funded through significant partnership working with funding coming from a variety of sources.
- 14.9 Policy IC1 sets out the approach to delivering new infrastructure in the city. An infrastructure delivery plan is being prepared to go alongside the Exeter Plan. In addition, more detail about the specific infrastructure and community facilities required to go alongside the various development proposals is included in the allocation policies.

IC1: Delivery of infrastructure (Strategic policy)

New development proposals will be supported by the delivery of associated infrastructure at the earliest practical opportunity and phased appropriately. Contributions will be sought through the Community Infrastructure Levy and Section 106 Agreements to ensure that the necessary infrastructure, facilities and services identified in the Infrastructure Delivery Plan are in place to support development.

Viability

- 14.10 In order to have an effective plan it is important that its development proposals are viable. Viable means that development can be delivered 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.
- 14.11 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.

- 14.12 Policy IC2 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.
- 14.13 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 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.
- 14.14 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.

IC2: Viability (Strategic policy)

To ensure that developments provide the necessary, planned policy requirements, affordable housing and infrastructure 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:

- a. Increases in infrastructure or abnormal development costs which could not reasonably have been foreseen at the time of the Exeter Plan's adoption;
- b. Adverse changes in building costs relative to sales values; and
- c. Worsening of local market conditions caused by a recession or an extraordinary event demonstrably affecting incomes and development values.

A viability appraisal of development proposals will need to be submitted explaining the circumstances which have led to the changes in viability since the Exeter Plan's adoption. Any variation from the proposed policy and affordable housing requirements, and deviation from the assumption that required infrastructure will be funded by development, will need to be justified.

The 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 City Council with the planning application documentation.

Where affordable housing or infrastructure requirements are not provided 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.

Community facilities

- 14.15 Exeter has a wealth of services and facilities that are essential for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. These facilities include schools, open spaces, allotments, sports pitches, leisure centres or other community facilities such as community halls, places of worship, libraries, children's centres and youth clubs. The protection of these facilities is of critical importance to our residents.
- 14.16 The assets of community value (ACV) process allows residents to specifically identify and nominate buildings or other assets which are of particular importance to furthering the social wellbeing or social interests of their local community. Once a nomination is successful, the community would then be notified and have the option to bid on the asset should it ever be listed for sale.
- 14.17 Alongside the protection of existing facilities, providing new facilities alongside development 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 and facilities are provided.
- 14.18 Where relevant, applications which would result in the loss of a privately run business serving an important community function (e.g. a pub) will be expected to be supported by evidence which demonstrates that the existing facility is no longer viable and that the sale of the business has been marketed for a period of 12 months in advance of the submission of the planning application.
- 14.19 Policy IC3 sets out the approach for the protection of existing, and delivery of new, community facilities in the city.

IC3: Community facilities (Strategic policy)

Existing services and facilities that meet community, social, health, welfare, education, spiritual, cultural, leisure and recreation needs (including assets of community value) 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 community services and facilities will be supported. Engagement should take place with local communities to ensure that needs are understood, planned for and met.

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 walking, cycling and public transport.

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, by walking and cycling.

Large scale residential proposals must provide the additional community facilities required to support any additional demand from new residents. Contributions will be sought where necessary.

Proposals for change of use from a business that serves a community function will need to be accompanied by evidence of having marketed the business/premises for its current use for a period of 12 months before the submission of the planning application.

Allotments, sports and recreation in new development

- 14.20 Access to high quality open outdoor spaces including opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities. The city's existing sport, leisure, public and private open spaces and allotments represent important assets serving the communities in which they are located and, in some instances, wider areas. Policy IC4 requires proposals for residential development to provide a range of publically accessible open space.
- 14.21 Amongst the current accessible green space in Exeter, there are 14 formal parks, 10 playing fields, 26 allotment sites (1500 plots), and 25 hectares of accessible woodland. When the Valley Parks are taken into consideration, public green space makes up nearly 10% of the total area of the city. However, the greatest value lies in the wealth of smaller parks and green spaces that are used on a more local basis for recreation, play and exercise, and that contribute to the resilience of communities.
- 14.22 Residential development generates a need for new open spaces. The following policy seeks to ensure that new development provides sufficient new provision commensurate with the scale of the proposal. The latest Fields in Trust guidelines for open space are widely acknowledged as the primary source of guidance regarding outdoor space provision by national and local government and so will be utilised as the benchmark level of expected open space. The guidance also sets out recommended minimum sizes for formal outdoor spaces which should also be used.
- 14.23 The City Council manages approximately 1500 individual allotment plots over 26 sites. Although the population of the city has increased considerably over the last fifteen years, total allotment provision has remained static since the previous allotment strategy was produced in 2007. All sites across the city are at full capacity and the waiting lists for allotment plots are extensive (over 800 as of 2023), leaving most waiting some time to secure a plot. A priority for the City Council over the next 20 years will be to ensure that new allotments are provided at a level proportionate to the increase in population. This is especially important given that new the strategic brownfield developments proposed in this plan will be higher density which could have an impact on the amount of private outdoor space.
- 14.24 The Fields in Trust guidance for provision of new open space does not cover provision for new allotment space. The National Society of Allotment and Leisure Gardeners recommend a quantitative standard of 20 plots per 1000 households (approximately 20 plots per 2200 people). The size of an allotment plot is 250 square metres (0.025ha). This standard is equivalent to 0.23ha of allotments per 1000 people. Given the management and space implications of provisioning new allotments, off-site financial contributions may be the most feasible means of meeting these requirements.
- 14.25 The City Council has recently approved a Playing Pitch Strategy. The Strategy considers the needs for pitch sports and tennis in Exeter, over the next 3-5 years (considered the practical lifetime of the Strategy) and over the longer term to 2040. New developments will need to consider this Strategy when planning for new sports provision.

14.26 Fields in Trust benchmark guidelines required by Policy IC4 are set out in the following table. A conversion will need to be undertaken to calculate the space by space type required per dwelling based on the development proposal's composition and house type. As a guide, the average household size in Exeter is 2.49, based on 2021 census data.

Type	Quantity guideline (hectares per 1,000 population)	Walking guideline (walking distance in metres from dwellings)
Parks and gardens	0.80	710m
Amenity green space	0.60	480m
Natural and semi-natural	1.80	720m
Playing pitches	1.20	1,200m
Other outdoor sports	0.40	1,200m
Allotments	0.23	1,200m

IC4: Sport, recreation and allotment space in new development

Proposals for residential development will be required to provide a range of open space in accordance with the Fields in Trust benchmark guidelines and provision for allotments as set out in the table in the supporting text.

All new open space should be:

- a. Located to ensure easy access from all parts of the development and from the wider area;
- b. Designed to be safe and secure, with clear sightlines, good, energy-efficient lighting, and appropriate landscaping;
- c. Designed to be inclusive and accessible to all, regardless of age, ability, or background; and
- d. Integrated into the wider pedestrian and cycle network.

Major development proposals may be required to provide appropriate on-site open space. Where on-site provision is not appropriate, off-site provision or financial contributions may be sought. Development proposals will make provision for the on-going management and maintenance of open space to standards that have been agreed with the City Council.

Where new sports provision is proposed, this must be designed to appropriate technical standards and must address the priorities for future provision as set out in the latest Council Playing Pitch Strategy.

Play areas in new development

- 14.27 The ability and opportunity to play outside is something that is often taken for granted. Yet, for many people, those opportunities are limited. We want our children to be active in a safe environment. Policy IC5 requires proposals for larger residential development to contribute to improving play area provision.
- 14.28 Despite the pressures on land and budgets, the City Council recognises the importance of active recreation to help tackle childhood obesity. Some new housing developments install and maintain play areas under a private management agreement, though the majority of play areas and greenspace for informal play remain under the City Council's control.
- 14.29 Over the last 30 years, the number of play areas within the city has almost doubled. Whilst this has improved choice, some of the play areas are only equipped with minimal equipment, reducing their appeal and leaving them underused. The approach going forward focuses more on improving the quality of play spaces within the city over the quantity.
- 14.30 A definition of Exeter's Play Areas is shown below.

Local Play Areas (LPA): Equipment should be provided to cater for children of up to 6-7 years of age. There should usually be an area up to 400m² activity area however, larger areas with limited play equipment provision can still be categorised as a Local Play Area. These areas will almost always be fenced off, a litter bin should always be provided, and in most cases seating as well. These areas should be considered the equivalent of Local Areas for Play in the Fields for Trust Guidance for Outdoor Sport and Play.

Neighbourhood Play Areas (NPA): Equipment should be provided to cater for children of up to at least 8 years old. A minimum of 400m² activity area must be provided. These areas must contain at least 5 types of play equipment, of which at least 2 items are individual pieces rather than part of a combined multi play unit. These areas should be considered the equivalent of Local Equipped Area for Play in the Fields for Trust Guidance for Outdoor Sport and Play.

Major Play Areas (MPA): Equipment should be provided to cater for children of up to at least 12 years of age. A minimum 1000m² activity area must be provided. At least 5 items should encourage more adventurous play e.g. climbing, swinging, balancing, rotating or gliding (cableway), and at least 3 of these should be individual items and not part of combined multi play unit. These areas should be considered the equivalent of Neighbourhood Equipped Area for Play in the Fields for Trust Guidance for Outdoor Sport and Play.

Strategic Play Areas (SPA): Strategic Play Areas will be sites within the 'Major' category that are of particular importance to a specific ward, an area, or the city as a whole. These sites will often have multi use games area facilities for ball games and perhaps skate provision or other facilities for older children and teenagers.

14.31 The table below sets out what is considered reasonable in terms of walking distances from home and appropriate levels of the different types of play area provision.

Type	Quantity guideline (hectares per 1,000 population)	Walking guideline (walking distance in metres from dwellings)
Local Play Areas and Neighbourhood Play Areas	0.25	400m
Major Play Areas (including Strategic Play Areas)	0.25	1000m
MUGAs and skateboard parks	0.30	700m

IC5: Play areas in new development

Major residential development proposals will be required to make suitable provision in accordance with Council Play Strategy guidance and:

- a. Where provision exists within a reasonable walking distance, a financial contribution towards improvement of the existing equipped/designated play space will be required; or
- b. Where no provision exists within a reasonable walking distance, new provision must be provided in accordance with the guidelines provided in the supporting text.

New cemetery provision

14.32 Exeter City Council currently operates three cemeteries in the City.

- Higher Cemetery, Heavitree: 15.0ha
- Exwick: 6.4ha
- Topsham: 2.1ha

14.33 Recent analysis shows that each of these sites are nearing capacity. To avoid a disruption in burial services, new provision will be required during the plan period. The land requirements for new burial provision across different time periods are set out below.

Year	Design life	New graves required (/yr)	New ashes plots required (/yr)	Total no. new graves	Total no. new ashes plots	Required area (ha)
2040	15yr	70	46	1035	690	0.98
2055	30yr	81	54	2168	1445	1.72
2075	50yr	99	66	3966	2644	2.89
2100	75yr	127	84	6781	4521	4.73
2125	100yr	162	108	10391	6927	7.09

14.34 Due to the challenges in finding suitable land within existing parts of the city, a series of criteria are set out in policy IC6 to allow for sites to come forward in areas that may otherwise be unsuitable for built development, including within areas high landscape sensitivity and the Valley Parks.

IC6: New cemetery provision

Proposals for additional cemetery provision within the city will be supported, providing that it can be demonstrated that the proposal:

- a. Does not have an unacceptable impact on landscape sensitivity or biodiversity;
- b. Is located outside areas at high risk of flooding;
- c. Is located outside areas of contaminated land or historic landfill;
- d. Is located outside Groundwater Protection Zones; and
- e. Does not result in the loss of public access, open space or areas of recreation, nor harm the potential opportunities for these functions.

15 Site allocations

Introduction

- 15.1 The City Council proposes to allocate a series of sites for development between now and 2040. The list of potential site allocations (included in policy H2) has been selected in accordance with the spatial strategy for the city, set out in policy S1.
- 15.2 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 (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; and
 - The presence of legal covenants or multiple ownership arrangements that could make the development so complex as to become unachievable.

Strategic brownfield allocations for mixed use development

- 15.3 The majority of development is proposed on six strategic brownfield site allocations that are located close to the city centre or key public transport hubs with good access to green infrastructure including the Valley Parks. The sites are identified in policy H2. These sites were part of the original Liveable Exeter work and are in multiple ownerships. The City Council intends that these sites are redeveloped to provide high quality, mixed use neighbourhoods at optimal densities that minimise the need to travel and maximise walking, cycling and opportunities to use public transport. The six sites will make a significant contribution towards meeting our housing requirement and economic growth ambitions.
- 15.4 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.
- 15.5 All of these sites are included on the proposals map and covered by site-specific allocation policies setting out the key requirements for development at each site.
- 15.6 Requirements set out in the allocation policies have been developed based on the site assessment work, discussion with promoters, from elements of site specific evidence, from thematic evidence and following the early stages of infrastructure planning work.

Predominantly residential allocations

- 15.7 Eighteen other site allocations are proposed for new housing development in policy H2. 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, these sites helping to provide a mix of development opportunities to enable housing

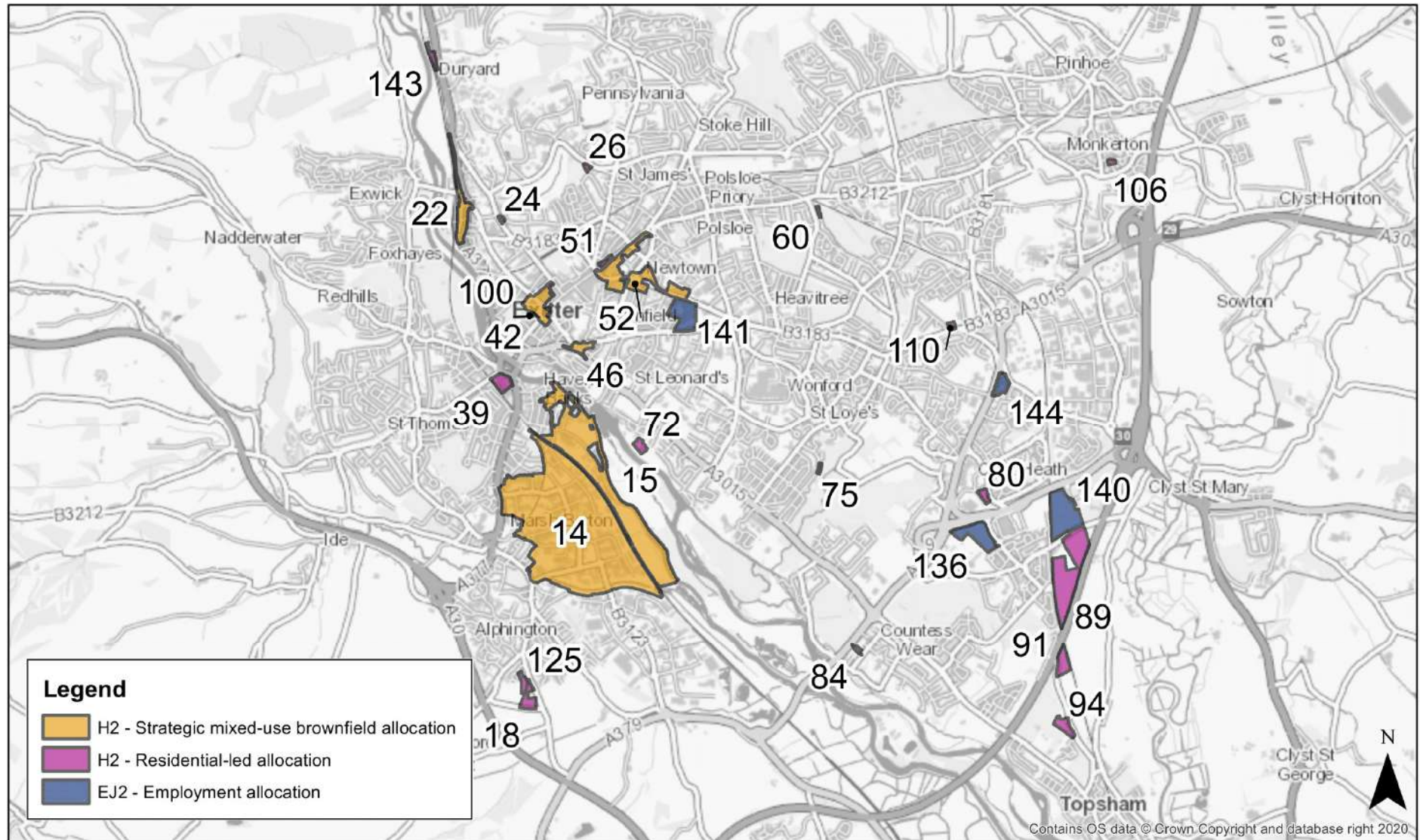
delivery throughout the plan-period. A number of the smaller brownfield sites are owned by the City Council. Others are owned by other individuals and organisations.

- 15.8 The residential site allocations are included on the proposals map but are not covered by individual allocation policies either due to their smaller scale and/or because they are being proposed for more limited development types.

Employment allocations

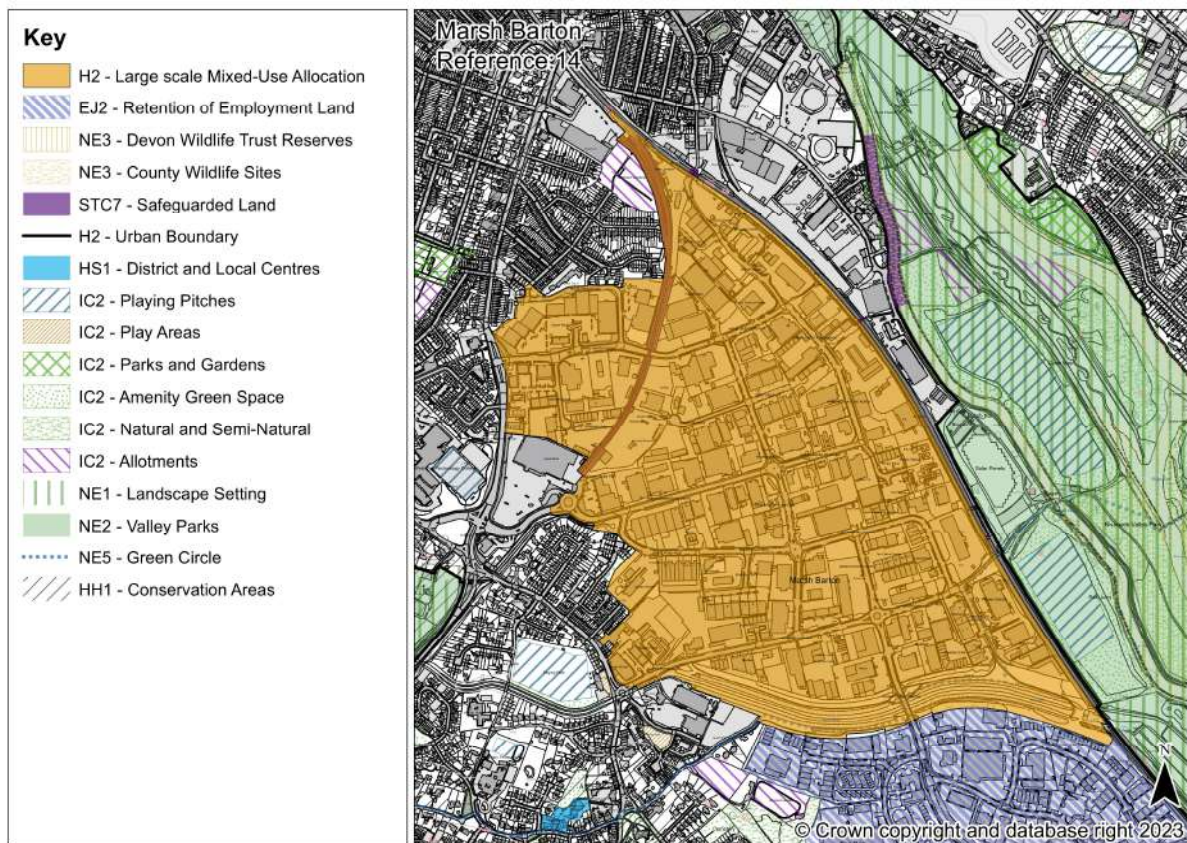
- 15.9 In addition to the strategic brownfield, mixed use allocations and the residential allocations, a series of employment sites have been identified for allocation in policy EJ6. These sites will help play an important role in meeting employment needs and supporting the growth of the city.
- 15.10 These sites have also been assessed in accordance with the HELAA methodology. This is consistent with the Exeter Employment Study and Economic Development Needs Assessment.

Map of proposed allocations



Marsh Barton: Site reference 14

- 15.11 Marsh Barton is the largest strategic site (in terms of area) proposed for allocation in the Exeter Plan. Located between Alphington Road and the Great West Mainline railway in the southwest of the city, it will provide high quality, mixed use development up to the end of the plan period in 2040 and beyond. The site is currently in use and so is brownfield and currently contains a variety of uses including light industry, bulky goods retail, car show rooms and waste management facilities.
- 15.12 Although the site is currently one of the city's main employment areas, it is developed at low densities and so provides a real opportunity to be redeveloped as a high quality mixed use neighbourhood to provide a large amount of housing whilst continuing to provide significant employment space in a location relatively close to the city centre and the nearby site allocation of Water Lane.
- 15.13 The scale of the site provides a unique opportunity to comprehensively and creatively redevelop an area of the city providing high quality development and an attractive walkable neighbourhood with high specification, low carbon credentials. The mixture of residential and employment uses on the site will be supported by a full range of community uses including education, healthcare and green infrastructure which will minimise the need to travel and enable the development to be low car. Links to the Riverside Valley Park and the new Marsh Barton railway station will support active travel and healthy lifestyles.
- 15.14 The site is currently in multiple ownerships, including small areas owned by the public sector. There is strategic infrastructure on site such as the waste management facilities and energy infrastructure which will need to be safeguarded. The number of owners and scale of the regeneration opportunity mean that the site would be delivered in phases and potentially through innovative mechanisms with coordination from the public sector to deliver a high quality new quarter for Exeter.
- 15.15 Further work will be required to consider the delivery of Marsh Barton through a master-planning exercise. This will include local community engagement.



Marsh Barton – Reference 14 (Strategic policy)

A site of 90 hectares at Marsh Barton is identified for a mixed-use development delivering approximately 1,000 homes and employment floor-space in phases up to 2040. The development must support the achievement of net zero and accord with the Liveable Exeter Principles to deliver a compact and well-connected neighbourhood, incorporating the highest standards of design.

The following will be required:

- A. A housing mix built to optimal densities taking account of local context and the Exeter Density Study, which meets a wide range of housing needs including:
 - i. 35% affordable homes for eligible households with a local connection or key workers, of which 50% will be for social rent, 13% for affordable rent, 25% for First Homes with a discount of 30% on market prices and the remainder for additional affordable homeownership;
 - ii. Custom and self-build plots;
 - iii. At least 10% of market homes and 10% of affordable homes built to meet wheelchair adaptable standards and all other homes built to meet accessible and adaptable standards;
 - iv. A range of dwelling sizes that takes account of local need; and
 - v. A 70 unit extra care housing scheme.
- B. The re-provision of existing levels of employment space at higher densities to make more efficient use of land, including:

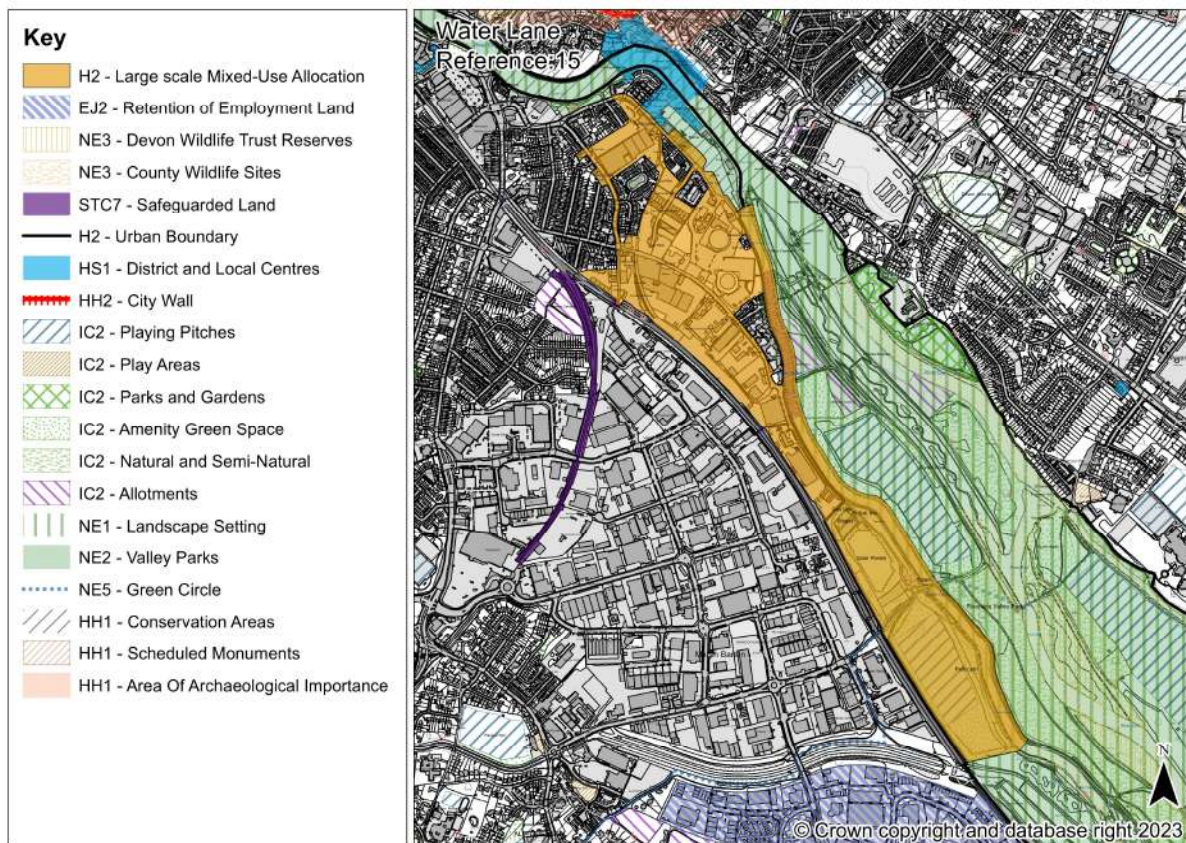
- i. A mix of new forms of employment provision to meet the needs of the transformational sectors, including work hubs, collaborative workspace and live-work schemes; and
 - ii. Provision of start-up units for small and medium enterprises.
- C. A locally accessible neighbourhood centre including:
- i. Public realm that provides space for community and cultural activities;
 - ii. A community building with hall, meeting rooms and flexible space for potential library provision, youth, adult's services, children's services and cultural activities;
 - iii. New surgery providing GP, pharmacy and other community healthcare or contributions to GP provision;
 - iv. Retail or commercial units;
 - v. A work hub;
 - vi. A mobility hub; and
 - vii. An all-through school including early years, primary, secondary and special educational needs and communal space for children's centre service provision;
 - viii. Potential transformational, strategic, anchor facility including commercial, leisure, cultural, sport or civic uses.
- D. Transport infrastructure to deliver a low-car development:
- i. A layout in accordance with active design principles comprising a dense network of active travel routes which link to existing routes, Marsh Barton and St Thomas stations and the neighbourhood centre;
 - ii. High quality north-south and east-west active travel routes;
 - iii. The safeguarding of the disused railway line for use as an active travel and potential emergency access and egress route;
 - iv. The provision of improved active travel and public transport access at Tan Lane under the Great West Mainline towards Water Lane;
 - v. The provision of active travel improvements to the existing underbridge under the Great West Mainline linking to Water Lane;
 - vi. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling and Walking Infrastructure Plan;
 - vii. A mobility hub to provide for public transport, active travel and shared mobility;
 - viii. Provision of infrastructure for, and contributions to, public transport; and
 - ix. Electric vehicle charging points throughout the site.
- E. Enhancement of the natural environment and Green Infrastructure:
- i. Green Infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision;
 - ii. A mix of open space provision including for sport and recreation;
 - iii. High quality green infrastructure improvements to the Alphin Brook and linking to the Exeter Ship Canal and Riverside Valley Park;
 - iv. On-site provision of allotments;
 - v. Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South-east Devon Mitigation Strategy; and
 - vi. Biodiversity enhancements.

- F. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- G. Appropriate measures to respond to, and ensure the continued operation of, the high voltage power network.
- H. Appropriate flood risk mitigation:
 - i. A layout informed by a detailed flood risk assessment which addresses flood risk from all sources ensuring a consistency of approach with Water Lane;
 - ii. Sustainable Urban Drainage to mitigate against flood risk;
 - iii. Provision of the necessary infrastructure to help deliver the Drainage and Wastewater Management Plan; and
 - iv. An emergency access and egress route and access bridge over the Great Western Mainline linking to Water Lane.
- I. Conservation and enhancement of the historic environment:
 - i. A layout informed by archaeological and heritage assessment, evaluation and mitigation; and
 - ii. A built form that protects the settings of all nearby listed buildings.
- J. Measures to support the continued operation of the waste operations and cement works on site or contributions to replacement facilities elsewhere.

Note: Policy not yet tested by viability appraisal.

Water Lane: Site reference 15

- 15.16 Water Lane is one of the largest strategic sites proposed for allocation in the Exeter Plan, located between the Exeter Ship Canal and the Great West Mainline railway. The site is brownfield and currently contains a variety of uses including business premises and workshops, utilities infrastructure, public car, coach and boat parking, leisure and community facilities including for water-based activities and Grace Road Playing Field (now disused). The site boundary has extended slightly since the last consultation to include the canal and the highway of Water Lane itself.
- 15.17 The majority of the proposed Water Lane allocation is already identified for mixed-use, residential-led redevelopment in the Exeter Local Plan First Review. The site is also included in the Liveable Exeter initiative. The City Council proposes to roll this allocation forwards into the Exeter Plan.
- 15.18 Water Lane provides a great opportunity to deliver a high quality, low-car new neighbourhood that is well served by a school, community, cultural and sustainable travel facilities (including the new Marsh Barton railway station), has good access to employment and links effectively to the Riverside Valley Park. Development will need to respond to challenges such as flood risk, restricted access, contamination and protecting the amenity of nearby residents. It will also need to reflect the site's rich industrial and water-related heritage.
- 15.19 The proposed site allocation will be supported by a Water Lane Supplementary Planning Document (SPD), which is currently being prepared by the City Council and is also subject to consultation. The SPD will contain a development framework and design code for the site, alongside strategies for access and utilities provision, to help ensure that Water Lane is redeveloped in a comprehensive, co-ordinated way and at a high quality which reflects the Liveable Exeter principles.
- 15.20 Because this site is beginning to come forward for development now, early community engagement with local groups has been held to steer ideas for the Water Lane development recognising that this is a flagship regeneration area for the city.
- 15.21 The site is currently in multiple ownerships, including areas owned by the City Council while there are current planning applications for some parts of the site. The site boundary has changed slightly since the last Exeter Plan consultation to include the canal itself so it can be better enhanced by the proposals and include the road of Water Lane.
- 15.22 Further work will be required to consider the delivery of Water Lane through a master-planning exercise. This will include local community engagement. Some of this engagement is currently being undertaken via the work on the Water Lane Design Code.



Water Lane – Reference 15 (Strategic policy)

A site of 36 hectares at Water Lane is identified for a mixed-use development delivering approximately 1,600 homes and the retention of existing levels of employment floor-space in phases up to 2040. The development must support the achievement of net zero and accord with the Liveable Exeter Principles and the Water Lane Design Code Supplementary Planning Document to deliver a compact and well-connected neighbourhood, incorporating the highest standards of design.

The following will be required:

- A. A housing mix built to optimal densities taking account of local context and the Exeter Density Study which meets a wide range of housing needs including:
 - i. 35% affordable homes for eligible households with a local connection or key workers, of which 50% will be for social rent, 13% for affordable rent, 25% for First Homes with a discount of 30% on market prices and the remainder for additional affordable homeownership;
 - ii. Custom and self-build plots;
 - iii. At least 10% of market homes and 10% of affordable homes built to meet wheelchair adaptable standards and all other homes built to meet accessible and adaptable standards;
 - iv. A range of dwelling sizes that takes account of local need; and
 - v. A 70 unit extra care housing scheme.

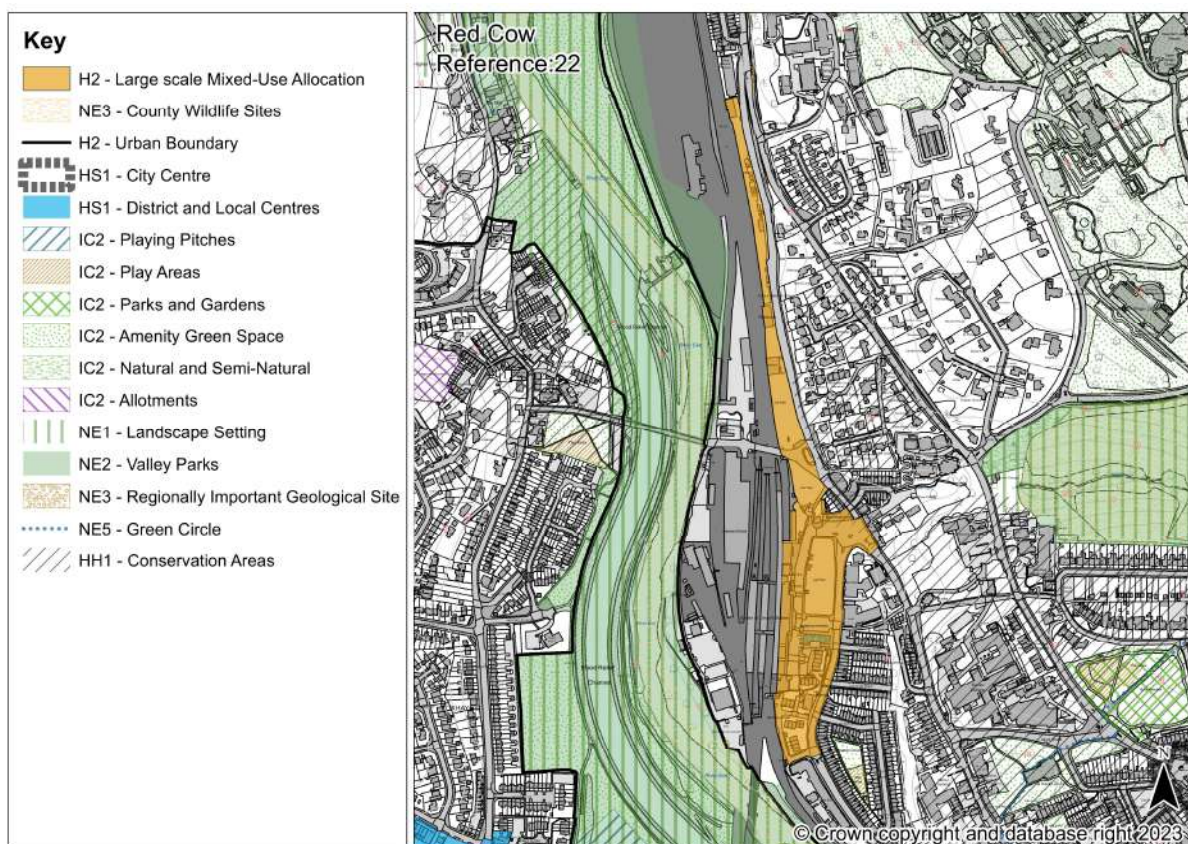
- B. A mix of new forms of employment provision to meet the needs of the transformational sectors, including work hubs, collaborative workspace and live-work schemes, together with maritime sectors.
- C. A locally accessible neighbourhood centre including:
 - i. Public realm that provides space for community and cultural activities;
 - ii. A community building with hall, meeting rooms and flexible space for potential library provision, youth, adult's services, children's services and cultural activities;
 - iii. New surgery providing GP, pharmacy and other community healthcare or contributions to GP provision;
 - iv. Retail or commercial units with active ground floors accommodating local shops and services;
 - v. A work hub;
 - vi. A mobility hub;
 - vii. A 2-form entry primary school including early years and communal space for children's centre service provision and contributions to secondary and special educational needs provision; and
 - viii. Provision of additional space for water-related activities and safeguarding of the infrastructure needed to support strategic water-related uses.
- D. Transport infrastructure to deliver a low-car development:
 - i. A layout in accordance with active design principles, with Water Lane providing an active travel spine to the neighbourhood centre and Marsh Barton Station, improved active travel routes along the Canal frontage and frequent, active green streets running towards the River Exe;
 - ii. Low-car development supported by active travel measures that include mobility hubs to provide for public transport, active travel and shared mobility;
 - iii. Provision of infrastructure for and contributions to public transport;
 - iv. Delivery of or contributions to a new pedestrian and cycle crossing of the Canal and River Exe;
 - v. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling and Walking Infrastructure Plan;
 - vi. The provision of improved active travel and public transport access at Tan Lane under the Great West Mainline towards Marsh Barton; and
 - vii. Electric vehicle charging points throughout the site.
- E. Enhancement of the natural environment and Green Infrastructure:
 - i. Green Infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision
 - ii. A mix of open space provision including for sport and recreation;
 - iii. High quality green infrastructure linking to the Exeter Ship Canal and Riverside Valley Park; and
 - iv. Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South-east Devon Mitigation Strategy; and
 - v. Biodiversity enhancements.

- F. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- G. Appropriate measures to respond to, and ensure the continued operation of, the gas and electricity infrastructure network across the site.
- H. Appropriate flood risk mitigation:
 - i. A layout informed by a detailed flood risk assessment which addresses flood risk from all sources ensuring consistency of approach with Marsh Barton;
 - ii. Sustainable Urban Drainage to mitigate against flood risk and provision of the necessary infrastructure to help deliver the Drainage and Wastewater Management Plan; and
 - iii. Delivery of, or contributions to, an emergency access and egress route and access bridge over the Great Western Mainline linking to Marsh Barton.
- I. Conservation and enhancement of the historic environment:
 - i. A layout informed by archaeological and heritage assessment, evaluation and mitigation;
 - ii. A built form that enhances the character and appearance of the Riverside Conservation Area and protects the settings of all listed buildings; and
 - iii. Enhancement of the historic Canal, with key buildings, materials and industrial structures including the Gas Works Former Manager's House retained and reused creatively to support a distinct character rooted in the area's history.
- J. Measures to support the continued operation of the waste operations close to the site.

Note: Policy not yet tested by viability appraisal.

Red Cow: Site reference 22

- 15.23 Red Cow is a large strategic site proposed for allocation in the Exeter Plan, located in the area of St David's railway station. 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. The site is brownfield and currently contains St David's station's 'head-house', surface car parks associated with the railway station, storage and industrial uses, student accommodation and shops. The site boundary has extended since the last consultation to include the student accommodation at Brunel Close.
- 15.24 Part of the site is already allocated for mixed use redevelopment in the Exeter Local Plan First Review. The site is also included in the Liveable Exeter initiative. The City Council proposes that the existing allocation should be extended in the Exeter Plan in order to maximise the site's potential.
- 15.25 Red Cow offers the opportunity to deliver an impressive and memorable city gateway, creating a sense of arrival into Exeter. As a strategic transport hub, the site is well suited to deliver a low carbon, low-car neighbourhood that optimises density. In order to deliver the high quality gateway envisaged, land owners, the City Council and other interested parties will need to work in close partnership. The development must meet the needs of railway uses, as well as responding to challenges such as flood risk, contamination, and protection of the amenities of nearby residents.
- 15.26 Further work will be required to consider the delivery of Red Cow through a master-planning exercise. This will include local community engagement.



Red Cow – Reference 22 (Strategic policy)

A site of 4 hectares at Red Cow is identified for a residential led mixed-use development delivering approximately 280 homes and an impressive and memorable city gateway that creates a sense of arrival into Exeter. The development must support the achievement of net zero and accord with the Liveable Exeter Principles, incorporating the highest standards of design and delivering a place people will visit, stay, work and live.

The following will be required:

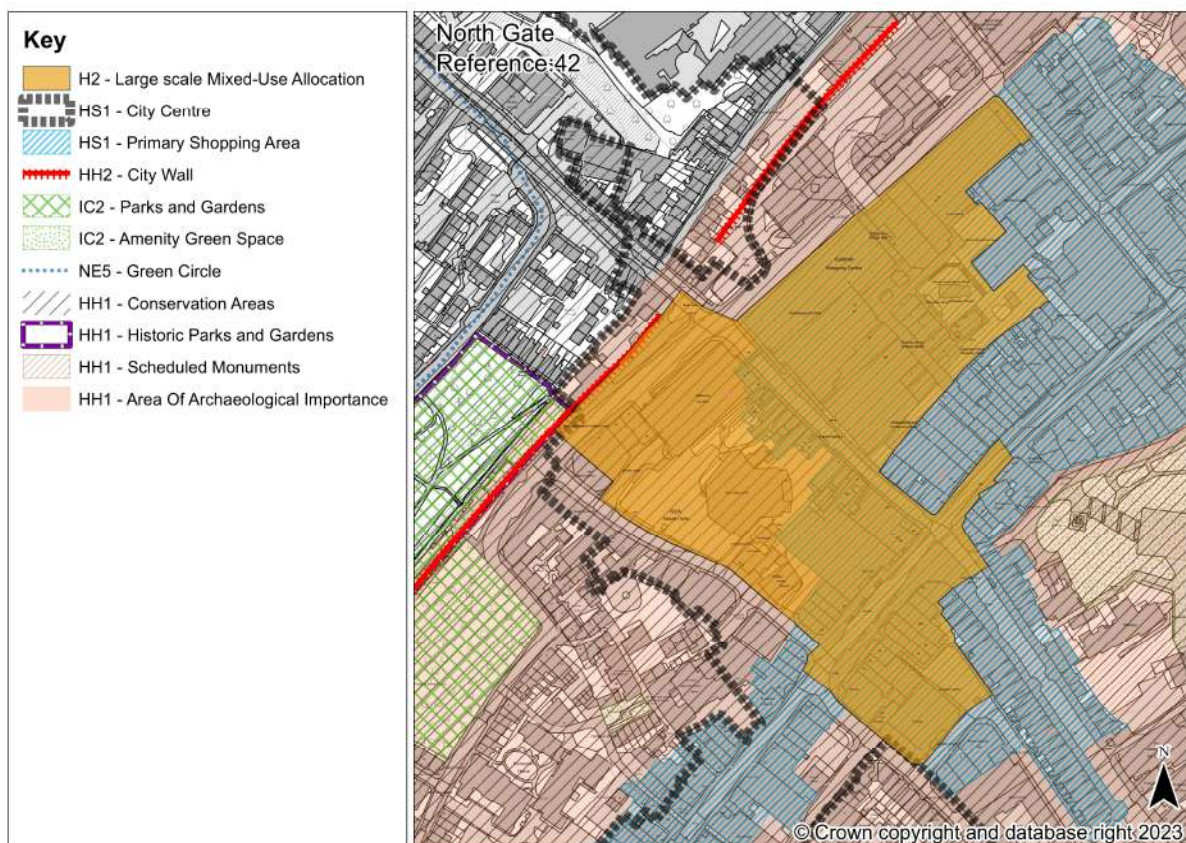
- A. A housing mix built to optimal densities taking account of local context and the Exeter Density Study which meets a wide range of housing needs including:
 - i. 35% affordable homes for eligible households with a local connection or key workers, of which 50% will be for social rent, 13% for affordable rent, 25% for First Homes with a discount of 30% on market prices and the remainder for additional affordable homeownership;
 - ii. Custom and self-build plots;
 - iii. At least 10% of market homes and 10% of affordable homes built to meet wheelchair adaptable standards and all other homes built to meet accessible and adaptable standards; and
 - iv. A range of dwelling sizes that takes account of local need.
- B. A mix of new forms of employment provision to meet the needs of the transformational sectors, including work hubs, collaborative workspace and live-work schemes.
- C. Social, community and cultural infrastructure including:
 - i. Public realm that provides space for community and cultural activities;
 - ii. Retail or commercial units;
 - iii. Contributions to early years, primary, secondary and special educational needs provision; and
 - iv. Contributions to GP provision.
- D. Transport infrastructure to deliver a low-car development:
 - i. A transport interchange/mobility hub for public transport, active travel and shared mobility;
 - ii. A layout in accordance with active design principles comprising active travel routes to provide access to and from St David's station and linking to the existing routes in the area including routes along the River Exe;
 - iii. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling and Walking Infrastructure Plan;
 - iv. Provision of infrastructure for, and contributions to, public transport; and
 - v. Electric vehicle charging points throughout the site.
- E. Enhancement of the natural environment and Green Infrastructure:
 - i. Green Infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision;
 - ii. Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South-east Devon Mitigation Strategy; and

- iii. Biodiversity enhancements.
- F. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- G. Appropriate flood risk mitigation:
 - i. A layout informed by a detailed flood risk assessment which addresses flood risk from all sources, including the Taddiforde Brook, and makes provision for emergency access and egress;
 - ii. Sustainable Urban Drainage to mitigate against flood risk; and
 - iii. Provision of the necessary infrastructure to help deliver the Drainage and Wastewater Management Plan.
- H. Conservation and enhancement of the historic environment:
 - i. A layout informed by archaeological and heritage assessment, evaluation and mitigation; and
 - ii. A built form that enhances the character and appearance of St David's Conservation Area and retains sight lines of locally listed St David's station.

Note: Policy not yet tested by viability appraisal.

North Gate: Site reference 42

- 15.27 North Gate is a large strategic site proposed for allocation in the Exeter Plan located in the heart of the city centre. The site is brownfield and currently contains a variety of uses including retail units, restaurants, cafes and takeaways, small scale commercial uses, a public car park, leisure uses and a number of important historic buildings.
- 15.28 The regeneration of North Gate presents an opportunity to enhance the vitality and viability of this central area and deliver high quality new development that improves the attractiveness of the city centre. The site is well served by public transport and has great potential to deliver a high density, low carbon, low-car neighbourhood.
- 15.29 Development will need to retain the Guildhall Shopping Centre and respond to challenges such as respecting the setting of listed buildings and enhancing the conservation area, addressing surface water flood risk and respecting the amenity of existing residents.
- 15.30 Further work will be required to consider the delivery of North Gate through a master-planning exercise. This will include local community engagement.



North Gate – Reference 42 (Strategic policy)

A site of 5 hectares at North Gate is identified for a mixed-use development delivering approximately 200 homes and provision for employment, retail and commercial uses creating an impressive and memorable city centre gateway. The development must support the achievement of net zero and accord with the Liveable Exeter Principles, incorporating the highest standards of design and contributing to the vitality and viability of the city centre.

The following will be required:

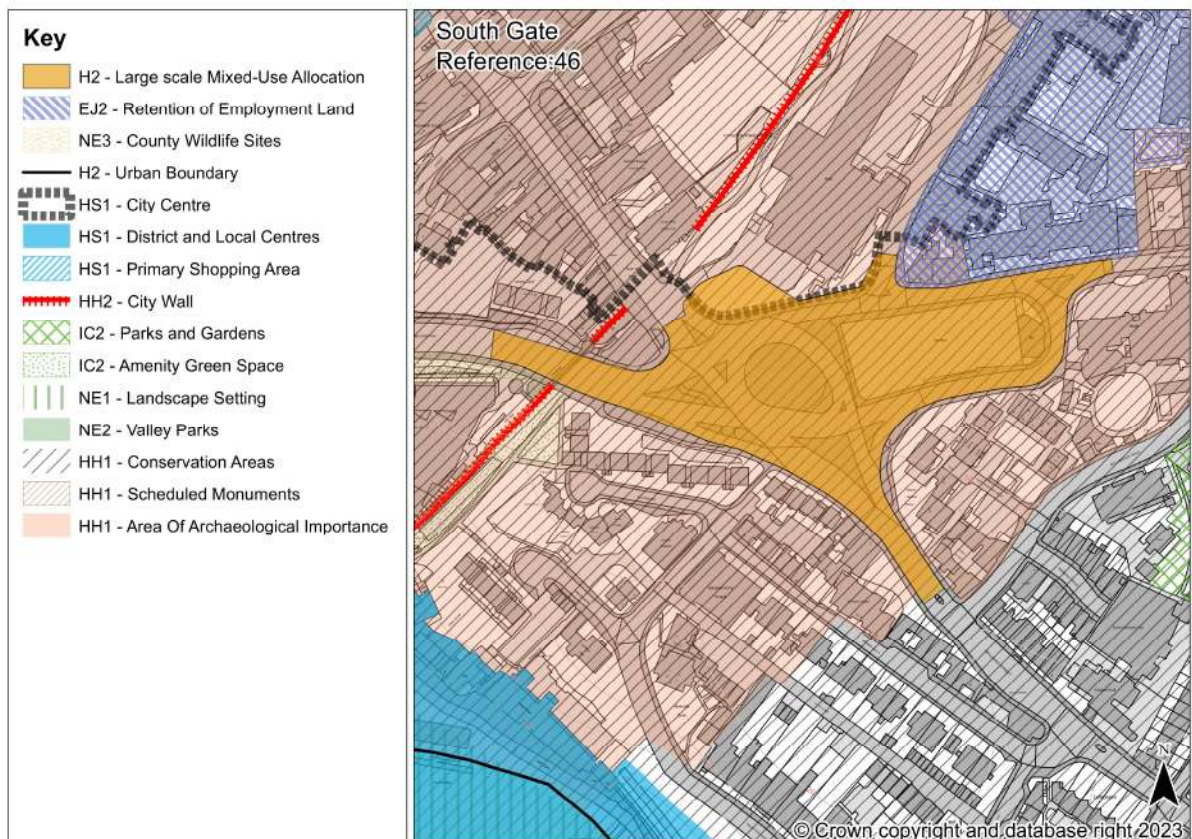
- A. A housing mix built to optimal densities taking account of local context and the Exeter Density Study which meets a wide range of housing needs including:
 - i. 35% affordable homes for eligible households with a local connection or key workers, of which 50% will be for social rent, 13% for affordable rent, 25% for First Homes with a discount of 30% on market prices and the remainder for additional affordable homeownership; and
 - ii. At least 10% of market homes and 10% of affordable homes built to meet wheelchair adaptable standards and all other homes built to meet accessible and adaptable standards;
- B. A mix of new forms of employment provision to meet the needs of the transformational sectors, including work hubs, collaborative workspace and live-work schemes.
- C. Retention and improvement of the Guildhall Shopping Centre to contribute to the vitality and viability of the city centre.
- D. Social, community and cultural infrastructure including:
 - i. Public realm that provides space for community and cultural activities;
 - ii. Retail or commercial units;
 - iii. Contributions to early years, primary, secondary and special educational needs provision; and
 - iv. Contributions to GP provision.
- E. Transport infrastructure to deliver a low-car development:
 - i. A layout in accordance with active design principles comprising active travel routes which link to the existing routes in the area;
 - ii. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling and Walking Infrastructure Plan;
 - iii. A mobility hub to provide for public transport, active travel and shared mobility;
 - iv. Provision of infrastructure for, and contributions to, public transport; and
 - v. Electric vehicle charging points throughout the site.
- F. Enhancement of the natural environment and Green Infrastructure:
 - i. Green Infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision;
 - ii. Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South-east Devon Mitigation Strategy; and
 - iii. Biodiversity enhancements.

- G. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- H. Appropriate flood risk mitigation:
 - i. A layout informed by a detailed flood risk assessment which addresses flood risk from all sources;
 - ii. Sustainable Urban Drainage to mitigate against flood risk; and
 - iii. Provision of the necessary infrastructure to help deliver the Drainage and Wastewater Management Plan.
- I. Conservation and enhancement of the historic environment:
 - i. A layout informed by archaeological and heritage assessment, evaluation and mitigation; and
 - ii. A built form that enhances the character and appearance of the Central Conservation Area and protects the settings of the City Walls and all listed buildings including St Mary Arches Church (grade 1 listed), Church of St Pancras (grade II* listed), the Synagogue (grade II* listed), Civic Hall Higher Market (grade II* listed) and Gaumont Palace/Mecca Bingo Club (grade II listed) and those along North Street, High Street, Mary Arches Street and other surrounding streets; and
 - iii. Contributions towards the repair, maintenance and enhancement of the Exeter City Walls where appropriate.

Note: Policy not yet tested by viability appraisal.

South Gate: Site reference 46

- 15.31 South Gate is located on the edge of the city centre and is currently dominated by the highway gyratory at the southern end of South Street and western end of Holloway Street (known as the Acorn gyratory). The site includes the Magdalen Street car park, a homeless shelter and a large area of roads and associated infrastructure.
- 15.32 The site provides a great opportunity to significantly enhance the appearance of this key gateway to the city centre, improve active travel links between the city centre and the quayside and deliver a significant number of new homes. Development in this location would significantly improve the efficiency of the use of land in an area which has excellent access to a range of facilities, jobs and shops.
- 15.33 Key considerations will be the loss of a public car park on site, the need to significantly realign the highway gyratory and take account of the utilities present in the area and the need to address potential impacts on the conservation area and the City Walls.
- 15.34 The site is currently largely owned by Devon County Council, either as a car park or as highway land, while the City Council has a lease on the public car park. The site boundary has changed since the last Exeter Plan consultation to remove areas of existing housing adjacent to Western Way, south of the highway gyratory, close to the City Walls, and also Cathedral and Quay car park. The site area is now more compact and focuses on Magdalen Street car park and the highway gyratory.
- 15.35 Further work will be required to consider the delivery of South Gate through a master-planning exercise. This will include local community engagement. This work is beginning to be organised by Devon County Council and the City Council.



South Gate – Reference 46 (Strategic policy)

A site of 1.36 hectares at South Gate is identified for a mixed-use development delivering approximately 170 homes and provision for employment, creating an impressive and memorable city centre gateway. The development must support the achievement of net zero and accord with the Liveable Exeter Principles to deliver a compact and well-connected neighbourhood, incorporating the highest standards of design.

The following will be required:

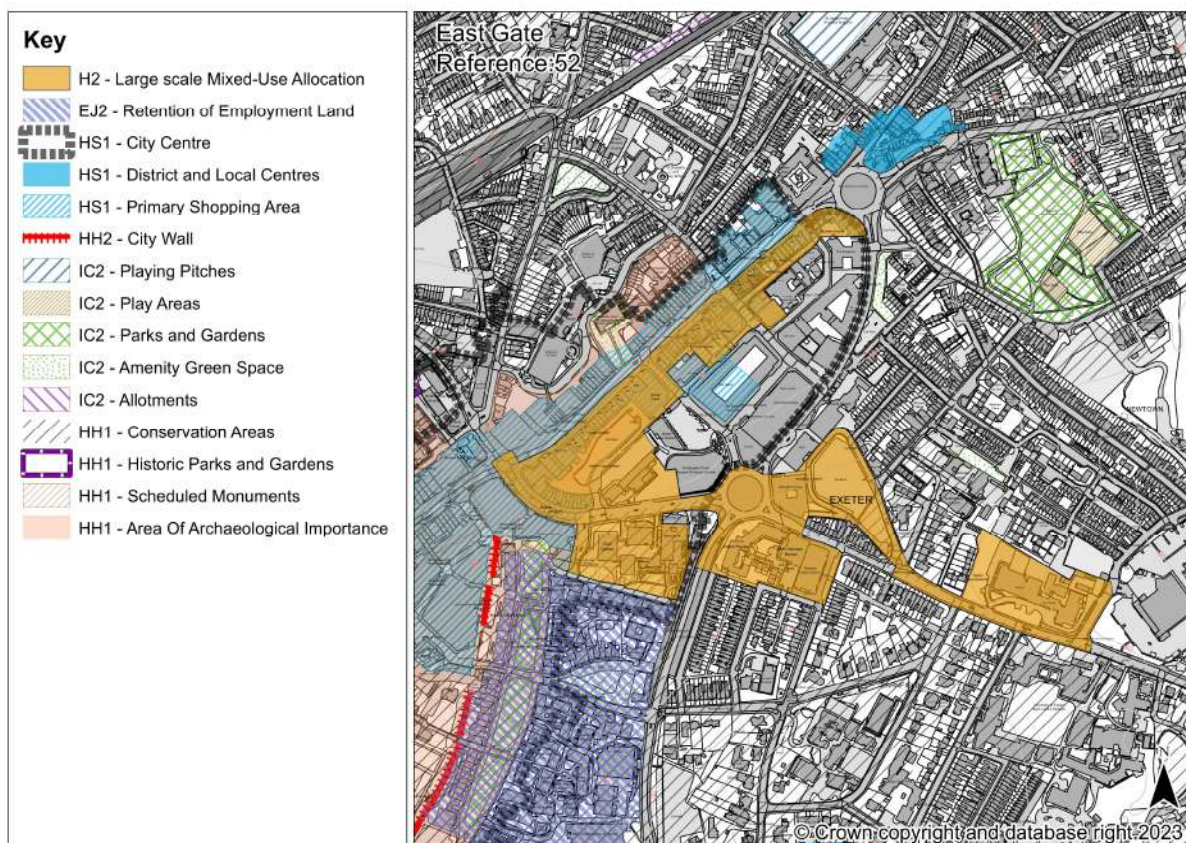
- A. A housing mix built to optimal densities taking account of local context and the Exeter Density Study which meets a wide range of housing needs including:
 - i. 35% affordable homes for eligible households with a local connection or key workers, of which 50% will be for social rent, 13% for affordable rent, 25% for First Homes with a discount of 30% on market prices and the remainder for additional affordable homeownership;
 - ii. Custom and self-build plots;
 - iii. At least 10% of market homes and 10% of affordable homes built to meet wheelchair adaptable standards and all other homes built to meet accessible and adaptable standards; At least 10% of market homes built to meet wheelchair adaptable standards, at least 10% of affordable homes built to meet wheelchair adaptable standards and all other homes built to meet accessible and adaptable standards;
 - iv. A range of dwelling sizes that takes account of local need; and
 - v. Re-provision, either on site or off site, of appropriate homeless accommodation.
- B. New employment provision in the form of a collaborative workspace.
- C. Social, community and cultural infrastructure including:
 - i. Public realm providing space for community and cultural activities;
 - ii. Contributions to early years, primary, secondary and special educational needs provision; and
 - iii. Contributions to GP provision.
- D. Transport infrastructure to deliver car free development:
 - i. A layout in accordance with active design principles comprising a dense network of active travel routes which link to the existing routes in the area;
 - ii. Alterations to the highway layout that improve active travel routes between the city centre and the Quay;
 - iii. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling and Walking Infrastructure Plan;
 - iv. A mobility hub to provide for public transport, active travel and shared mobility;
 - v. Provision of infrastructure for, and contributions to, public transport; and
 - vi. A small number of electric vehicle charging point parking spaces reserved for people with disabilities and access provided for service and emergency vehicles.
- E. Enhancement of the natural environment and Green Infrastructure:
 - i. Green Infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision

- ii. Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South-east Devon Mitigation Strategy; and
 - iii. Biodiversity enhancements.
- F. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- G. Appropriate flood risk mitigation:
- i. A layout informed by a detailed flood risk assessment which addresses flood risk from all sources;
 - ii. Sustainable Urban Drainage to mitigate against flood risk; and
 - iii. Provision of the necessary infrastructure to help deliver the Drainage and Wastewater Management Plan.
- H. Conservation and enhancement of the historic environment:
- i. A layout informed by archaeological and heritage assessment, evaluation and mitigation
 - ii. A built form that enhances the character and appearance of the Southernhay and The Friars and the Central Conservation Areas and protects the settings of the City Walls and all listed buildings including George's Chapel (grade I listed), Wynard's Hospital (grade II* listed), the Hotel Du Vin (grade II listed), the Gateway to Palmer's Almshouses (grade II listed), 45, 46, 49, 50 and 63 to 66 Magdalen Street (grade II listed), The White Ensign Club (grade II listed), 71 to 75 Holloway Street (grade II listed) and others in surrounding streets; and
 - iii. Contributions towards the repair, maintenance and enhancement of the Exeter City Walls where appropriate.

Note: Policy not yet tested by viability appraisal.

East Gate: Site reference 52

- 15.36 East Gate is a large strategic site proposed for allocation in the Exeter Plan. Located centrally within the city, the site is brownfield and stretches from Sidwell Street, along Paris Street down to Heavitree Road. It currently contains a variety of uses including office, business and retail, residential, public car parking, the former bus station and former Pyramids Leisure Centre.
- 15.37 East Gate provides a great opportunity to regenerate a tired area of the city into a high quality, low or zero-car new neighbourhood that is well served by the wide range of services, employment and facilities offered by its city centre location. Development will need to respond to challenges such as viability, heritage, protecting the amenity of nearby residents and ensuring sufficient provision for facilities currently in existence on the site.
- 15.38 The site is currently in multiple ownerships, although large parts of the site are owned by the City Council, including along Sidwell Street and Paris Street. The area includes the large regeneration scheme known as City Point. The site boundary has changed slightly since the last Exeter Plan consultation to include some unused land adjacent St Sidwell's Point and the Manor Court office building.
- 15.39 Further work will be required to consider the delivery of East Gate through a master-planning exercise. This will include local community engagement.



East Gate – Reference 52 (Strategic policy)

A site of 10.5 hectares at East Gate is identified for a mixed-use development delivering approximately 850 homes, provision for employment and an impressive and memorable city centre gateway. The development must support the achievement of net zero and accord with the Liveable Exeter Principles to deliver a compact and well-connected neighbourhood, incorporating the highest standards of design.

The following will be required:

- A. A housing mix built to optimal densities taking account of local context and the Exeter Density Study which meets a wide range of housing needs including:
 - i. 35% affordable homes for eligible households with a local connection or key workers, of which 50% will be for social rent, 13% for affordable rent, 25% for First Homes with a discount of 30% on market prices and the remainder for additional affordable homeownership;
 - ii. Custom and self-build plots;
 - iii. At least 10% of market homes and 10% of affordable homes built to meet wheelchair adaptable standards and all other homes built to meet accessible and adaptable standards; and
 - iv. A range of dwelling sizes that takes account of local need.
- B. A mix of new forms of employment provision to meet the needs of the transformational sectors, including work hubs, collaborative workspace and live-work schemes.
- C. Social, community and cultural infrastructure including:
 - i. Public realm that provides space for community and cultural activities;
 - ii. Retail or commercial units;
 - iii. A work hub;
 - iv. A mobility hub;
 - v. An innovation and literary hub;
 - vi. Contributions to early years, primary, secondary and special educational needs provision; and
 - vii. Contributions to GP provision.
- D. Transport infrastructure to deliver a low-car development:
 - i. Improved active travel routes which link to the existing routes in the area;
 - ii. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling and Walking Infrastructure Plan;
 - iii. A mobility hub to provide for public transport, active travel and shared mobility;
 - iv. Provision of infrastructure for, and contributions to, public transport; and
 - v. Electric vehicle charging points throughout the site.
- E. Enhancement of the natural environment and Green Infrastructure :
 - i. Green Infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision;
 - ii. Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South-east Devon Mitigation Strategy; and

- iii. Biodiversity enhancements.
- F. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- G. Appropriate flood risk mitigation:
 - i. A layout informed by a detailed flood risk assessment which addresses flood risk from all sources;
 - ii. Sustainable Urban Drainage to mitigate against flood risk; and
 - iii. Provision of the necessary infrastructure to help deliver the Drainage and Wastewater Management Plan.
- H. Conservation and enhancement of the historic environment:
 - i. A layout informed by archaeological and heritage assessment, evaluation and mitigation; and
 - ii. A built form that enhances the character and appearance of the Southernhay and The Friars and the Lower Summerlands Conservation Areas and protects the settings of all listed buildings including Sidwell Street Methodist Church (grade II* listed), 13-15 Dix's Field (grade II*) and those along Heavitree Road and Dix's Field.

Note: Policy not yet tested by viability appraisal.

The Exeter Plan

This is our city • This is our future



Your views are valued and responses to the questions will help shape the future of the new Exeter Plan.

Contact details

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Civic Centre, Paris Street, Exeter, EX1 1JN

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Please contact us to request this information in an alternative format or language.

We consider requests on an individual basis.

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Equality Impact Assessment: Exeter Plan: Full 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 3 October 2023	Exeter Plan: Full draft consultation	That Executive 1. That the Executive approves the Full Draft Exeter Plan (included in Appendix A) as the basis for public consultation commencing on 23 October 2023;	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. There

Committee name and date:	Report title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
		<p>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 Full Draft Plan content before it is published for consultation; and</p> <p>3. 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 a change to the consultation start date if required.</p>	<p>are however policies within the plan which aim to have specifically positive impacts on groups with protected characteristics; for example there are housing policies which set out support for housing for older people, younger people (including care leavers) and those with disabilities.</p> <p>It is however very challenging to concisely set out what the implications of the Exeter Plan will be on groups with protected characteristics because it will cover a period of 20 years and includes around 60 polities on a myriad of topics.</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
<p>Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).</p>	<p>Positive</p>	<p>Medium</p>	<p>The full draft plan sets out accommodation needs for gypsies and travellers and includes an associated policy.</p> <p>The plan also makes specific reference to the importance of culture, identify and understanding the needs of the wider community in planning for the future of the city and future. This would include the gypsy and traveller community.</p> <p>The consultation process will be arranged to reach the wider community, including groups with protected characteristics.</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>Medium</p>	<p>The full draft plan considers accommodation needs for groups with disabilities. There are also transport policies which specifically reference the need to make sustainable travel suitable for all. As an example, this would include promoting improve accessibility at all train stations in Exeter.</p>

Protected characteristic/ area of interest	Positive, neutral or negative impact	High, medium or low impact	Reason
			The consultation process will be arranged to reach the wider community, including groups with protected characteristics.
Sex/Gender	Positive	Low	<p>The plan does not include specific policies relating to this protected characteristic. However there could be low level positive impacts as a result of the design policies in the plan which aim to improve public spaces and increase natural surveillance. This could have some benefits in terms of women's safety.</p> <p>The consultation process will be arranged to reach the wider community, including groups with protected characteristics.</p>
Gender reassignment	Neutral	N/A	<p>The plan does not include specific policies relating to this protected characteristic and therefore no impact is anticipated.</p> <p>The consultation process will be arranged to reach the wider community, including groups with protected characteristics.</p>
Religion and belief (includes no belief, some philosophical beliefs)	Positive	Low	The plan itself does not include specific policies regarding this characteristic. However it does

Protected characteristic/ area of interest	Positive, neutral or negative impact	High, medium or low impact	Reason
such as Buddhism and sects within religions).			<p>make specific reference to the importance of culture, identify and understanding the needs of the wider community in planning for the future of the city.</p> <p>The consultation process will be arranged to reach the wider community, including groups with protected characteristics.</p>
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral	N/A	<p>The plan does not include specific policies relating to this protected characteristic and therefore no impact is anticipated.</p> <p>The consultation process will be arranged to reach the wider community, including groups with protected characteristics.</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).	Positive	Medium	<p>There could be a range of impacts in terms of this protected characteristic due to the breadth of age groups considered. As an example, the plan aims to provide appropriate housing for all groups and makes reference to the importance of accessibility for all in terms of public space, transport and housing.</p>

Protected characteristic/ area of interest	Positive, neutral or negative impact	High, medium or low impact	Reason
			<p>Infrastructure planning work has put significant emphasis on the need for education facilities while policies also identify the need for extra care housing in the city.</p> <p>The consultation process will be arranged to reach the wider community, including groups with protected characteristics.</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> <p>The consultation process will be arranged to reach the wider community, including groups with protected characteristics.</p>
Marriage and civil partnership status	Neutral	N/A	<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: 03.09.2023

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REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

Report of: Director of City Development

Title: Consultation on Liveable Water Lane: Development Framework and Design Code Supplementary Planning Document

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 preparing a Supplementary Planning Document to guide development at Water Lane and seeks approval for public consultation on the document.

2. Recommendations:

2.1 That the Executive approves the Liveable Water Lane: Development Framework and Design Code Supplementary Planning Document (included at Appendix A and hereafter referred to as the Water Lane SPD) as the basis for public consultation commencing on 23 October 2023;

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 Water Lane SPD content before it is published for consultation; and

2.3 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 a change to the consultation start date if required.

3. Reasons for the recommendation:

3.1 The Water Lane SPD will provide a development framework and design code for a key strategic brownfield site in Exeter. The SPD is required to support the delivery of high quality, co-ordinated redevelopment and placemaking in the area. Public consultation this autumn will enable the Council to adopt the SPD in time for it to guide the determination of planning applications that have been made, or are anticipated to be made, in the near future.

3.2 Preparation of the SPD delivers on a commitment in the Exeter Core Strategy (2006-2026) to produce a masterplan for Water Lane, following the allocation for redevelopment of the majority of the site in the Exeter Local Plan First Review (1995-2011). The SPD will also assist the Council in delivering the Liveable Exeter principles which were consulted

upon in the Outline Draft Exeter Plan in 2022 and which are contained in the Full Draft Plan that is proposed for consultation as a separate item on this agenda.

3.3 As the local planning authority for Exeter, the Council has a statutory duty to consult on the Water Lane SPD before it can be adopted. Consultation will enable the wider community to inform the document as it evolves towards its final version, will fulfil statutory requirements and will be in accordance with the Council's Statement of Community Involvement and Consultation Charter.

4. What are the resource implications including non financial resources

4.1 Consultation on the Water Lane SPD will run concurrently with the proposed consultation on the Full Draft Exeter Plan. As such, there are no direct additional costs or other resource implications associated with the recommendations.

5. Section 151 Officer comments:

5.1 There are no additional financial implications for Council to consider arising from this report.

6. What are the legal aspects?

6.1 The Planning and Compulsory Purchase Act 2004 established a system of local development planning in England. The Town and Country Planning (Local Planning) (England) Regulations 2012 (SI 2012/767) (the "Regulations") make provision for the operation of that system. The legal process for preparing and consulting on SPDs is set out in Part 5 of the Regulations. This includes a requirement for SPDs to be consulted on for a period of not less than four weeks. The Council will need to ensure that the Regulations are adhered to in the consultation process.

6.2 The Regulations include a requirement as part of any later subsequent adoption process to prepare an adoption statement setting out who has been consulted, a summary of the main issues raised and how those issues have been addressed in the SPD (Regulation 14).

7. Monitoring Officer's comments:

7.1 The monitoring officer has no issues to raise apart from to draw members' attention to the legal aspects as set out in paragraph 6 above.

8. Report details:

Background

8.1 Water Lane is a key strategic brownfield redevelopment area in Exeter and one of the largest sites of the Council's Liveable Exeter initiative (around 36 hectares). The site runs alongside the Riverside Valley Park and the Great West Mainline railway and is shown outlined in red on page 4 of the draft SPD (Appendix A). It currently contains a variety of land uses including business premises and workshops, utilities infrastructure, public car, coach and boat parking, leisure and community facilities including for water-based activities and Grace Road Playing Fields (now disused).

8.2 The majority of Water Lane has been allocated for mixed use residential-led redevelopment in the adopted development plan for many years. In the Exeter Local Plan First Review (adopted 2005) it forms part of a larger allocation called the “Quay and Canal Basin Area”, with appropriate uses highlighted as housing, leisure and “more environmentally acceptable” employment uses supported by financial contributions towards highways improvements, bus priority measures and facilities for pedestrians and cyclists. The Exeter Core Strategy (adopted 2012) identifies Water Lane as a location for comprehensive mixed use redevelopment and commits to the preparation of a masterplan for the site.

8.3 The Exeter Local Plan First Review and Core Strategy are to be replaced by the emerging Exeter Plan. The 2022 Outline Draft Exeter Plan consultation included a proposal to re-allocate Water Lane for residential-led mixed use redevelopment. The proposal is retained in the Full Draft Plan which is proposed for consultation this autumn in a separate item on this agenda.

8.4 Water Lane provides an opportunity to deliver a high quality, low-car new neighbourhood that is well served by a school, community, cultural and sustainable travel facilities (including the new Marsh Barton railway station), has good access to employment opportunities and links effectively to the Riverside Valley Park. Development will need to respond to challenges such as flood risk, restricted access, contamination and protecting the amenity of nearby residents. It will also need to reflect the site’s rich industrial and water-related heritage and link to Marsh Barton, which is also proposed for allocation in the Exeter Plan.

8.5 Water Lane is in multiple ownership, with only some land parcels owned by the Council. However, in order to secure high quality development that meets the Liveable Exeter principles and responds to the challenges set out above, it is vital that Water Lane is redeveloped in a comprehensive and co-ordinated way. To help achieve this, a draft development framework and design code for Water Lane has been prepared by LDA Design on the Council’s behalf (Appendix A), suitable for guiding future development at the site as an adopted SPD.

The Draft Water Lane SPD

8.6 The draft Water Lane SPD has been prepared to align with the Government’s National Model Design Code. To help ensure a joined up approach to design, infrastructure and service provision, it includes:

- A Vision for Water Lane (page 19 of the document), which sets out the type of place that Water Lane should be in the future;
- An illustrative development framework setting out different land use requirements within the site (e.g. a primary school, a neighbourhood centre incorporating a community green space, active travel infrastructure and areas for wildlife and nature) (page 22 of the document); and
- A comprehensive design code structured around the Council’s Liveable Exeter Principles (pages 23 to 131 of the document);

8.7 National Planning Practice Guidance stipulates that SPD should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new policies. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development. The Council's Local Development Scheme sets a timetable to adopt the Water Lane SPD in June 2024, before the timetabled adoption of the Exeter Plan (December 2025). As such, the draft Water Lane SPD has been prepared in the first instance to amplify the existing Water Lane site allocation made in the Exeter Local Plan First Review whilst also taking into account (as far as possible) the proposed policies and site requirements contained in the Full Draft Exeter Plan consultation document. Once the Exeter Plan is adopted, it may be necessary to review the Water Lane SPD to ensure that it fully aligns with the new Plan (see also paragraph 10.1 of this report).

8.8 In preparing the draft Water Lane SPD, LDA Design have undertaken extensive consultation with key stakeholders via one-to-one and group sessions, including with:

- Statutory and public bodies (e.g. the Environment Agency and officers from Exeter City and Devon County Council);
- Exeter City Council and Devon County Council Members (a report about the SPD was taken to Planning Member Working Group in July, and a workshop was also held in July to which relevant Ward Members and County Council Members were invited);
- Landowners and prospective developers; and
- Special interest groups such as the Devon Wildlife Trust and Quay and Canal Trust.

8.9 In line with best practice, the draft Water Lane SPD has also been informed by early community engagement using a Citizens Panel. This has involved a series of workshops, one-to-one sessions and drop-ins with local community representatives (many of whom are aware of the views on the broader community) and businesses. The aim of the Citizens Panel has been to give local people an opportunity to input meaningfully into the SPD from the outset, rather than waiting until formal consultation takes place. In this way, it is hoped that the draft Water Lane SPD will better reflect the hopes of local people and encourage good support at the formal consultation stage.

8.10 It is important that statutory public consultation on the draft Water Lane SPD takes place this autumn so that the Council can adopt the final SPD as soon as possible and use it to guide the determination of planning applications. Developer interest in Water Lane is already being shown, including through planning applications 22/1145/FUL for the Haven Banks Retail Park and 23/1007/OUT for Water Lane (South). The former Gas Holder site owned by Wales and West Utilities and the National Grid has also recently been marketed for redevelopment.

Consultation arrangements

8.11 Detailed consultation arrangements will be made in due course. However, the key document for the consultation will be the draft Water Lane SPD and the consultation will:

- Start on 23 October 2023 and run for a period of six weeks in accordance with the Consultation Charter;

- Use the Commonplace engagement platform as the basis for the consultation;
- Include questions about the draft SPD;
- 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 at least one public exhibition 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.

8.12 The consultation will be undertaken in accordance with the Council's Consultation Charter and Statement of Community Involvement.

8.13 The Local Development Scheme schedules adoption of the Water Lane SPD for June 2024, subject to Council approval. The report in June 2024 to Council will include an adoption statement that provides a summary of the comments made during the proposed autumn consultation and explain how these have been taken into account in shaping the final version of the Water Lane SPD.

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

9.1 Public consultation on the Water Lane SPD will enable the Council to progress towards its adoption, thereby supporting the creation of a new high quality, low car neighbourhood. As such, consultation on the Water Lane SPD is important to ensure 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.

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

10.1 The Government is currently consulting on reforms to the Levelling-Up and Regeneration Bill, including amendments to national planning policy. The consultation includes a proposal that existing SPDs should be reviewed to identify if they are still relevant and therefore suitable for retention, or if the guidance they provide should instead be integrated into the authority's new Local Plan. To reduce the risk of losing the planning policy controls afforded by the Water Lane SPD, it has been drafted to reflect (as far as possible) the policies proposed in the Full Draft Exeter Plan. The proposed development requirements for Water Lane contained in the Full Draft Exeter Plan are also reflected (as far as possible) in the draft SPD.

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 impacts have 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 direct carbon/environmental impacts arising from the recommendations to hold a public consultation on the draft Water Lane SPD. However, the digital consultation methods will minimise the carbon footprint associated with holding the consultation. The design code within the draft Water Lane SPD also includes specific content which will play a role in achieving net zero.

13. Are there any other options?

13.1 Public consultation is a statutory requirement for preparing a SPD and this needs to take place this autumn in order to maintain timely progress towards adoption. The only other option is to consult on the SPD at a later date. However, this is not considered to be an appropriate option given the need adopt the SPD as soon as possible.

Director of City Development, Ian Collinson

Author: Katharine Smith, Principal Project Manager - Local Plan

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

Background papers used in compiling this report:-

None

Contact for enquires:
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Liveable Water Lane Supplementary Planning Document

Development Framework and Design Code

Draft September 21st 2023



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This document has been prepared and checked in accordance with ISO 9001:2015

Chapter 1

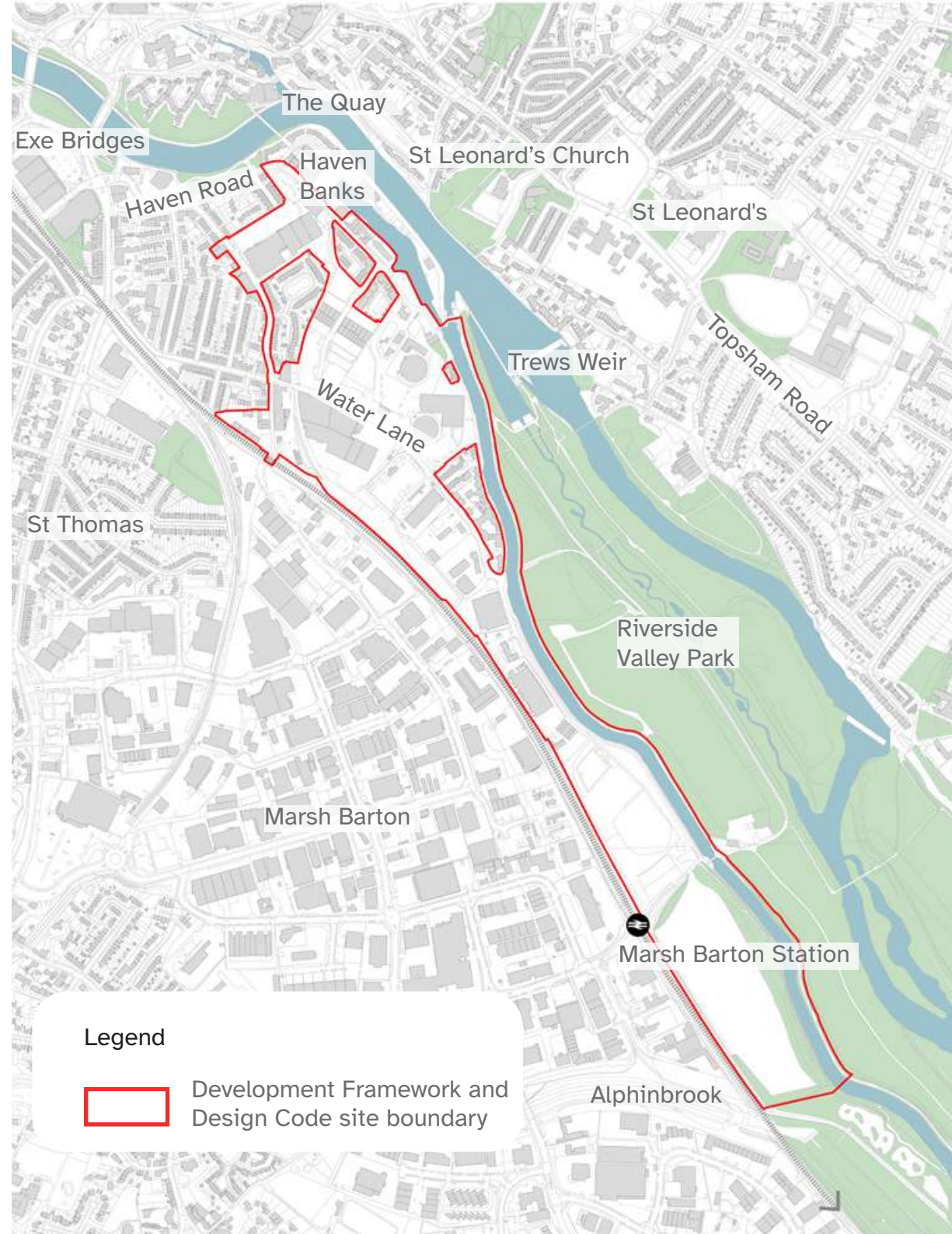
Introduction

1.1 Overview

Water Lane is a key strategic brownfield redevelopment area in Exeter and one of the largest sites of Exeter City Council's Liveable Exeter initiative. The site runs alongside the Riverside Valley Park and the Great West Mainline railway. It currently contains a variety of land uses including business premises and workshops, utilities infrastructure, public car, coach and boat parking, leisure and community facilities including for water-based activities and Grace Road playing fields (now disused).

Water Lane provides an opportunity to deliver a high quality, low-car new neighbourhood that is well served by a school, community, cultural and sustainable travel facilities, with good access to employment opportunities and effective links to the Valley Park. Development will need to respond to challenges including flood risk, restricted access, contamination and protecting the amenity of nearby residents. It will also need to reflect the site's rich industrial and water-related heritage.

The Liveable Water Lane Supplementary Planning Document (hereafter referred to as the SPD) amplifies adopted and emerging planning policy by providing a Vision, Development Framework and Design Code (the Code) to guide the delivery of high quality, co-ordinated redevelopment and placemaking in the area.



1.2 Planning policy framework

The SPD elaborates on the principles and policy set out in national and local planning policy documents. These are summarised below:

The National Planning Policy Framework

The National Planning Policy Framework (NPPF) provides a framework within which locally-prepared plans for housing and other development can be produced. It highlights that the role of the planning system is to achieve development that is environmentally, economically and socially sustainable. To achieve sustainable development paragraph 20 highlights that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. In doing so, policies should make sufficient provision for housing and commercial uses, infrastructure and community facilities, and make provision for the conservation and enhancement of the natural, built and historic environment.

Good design is identified as a key aspect of sustainable development. Paragraph 130 and, more broadly, the National Design Guide, stipulate that planning policies and decisions should ensure that developments:

- a. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

- d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e. optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f. create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience’.

The NPPF is complemented by planning practice guidance for a broad range of topics.

Exeter Local Plan

The adopted Local Plan for Exeter comprises the Core Strategy Development Plan Document (DPD) which was adopted in February 2012, and policies in the Exeter Local Plan First Review that have been saved. This SPD builds upon and provides more detailed guidance specifically in relation to policy KP6 of the Exeter Local Plan First Review and policy C17 of the Core Strategy, which set out high-level development aspirations for Water Lane. The supporting text to policy KP6 highlights that appropriate uses within the Water Lane area will include housing, leisure and “more environmentally acceptable” employment uses supported by financial contributions towards highways improvements, bus priority measures and facilities for pedestrians and cyclists.” For the Quay and Canal Basin area, policy C17 states that development should:

- ‘respect the historic character of the area and incorporate uses that realise the potential of existing high quality historic buildings;
- provide a high quality public realm that adds to the interest and draw of the area;
- establish an attractive and safe environment that encourages social interaction and relaxation within the Piazza Terracina and along the Riverside walk;
- include attractions that tell Exeter’s historic story as an important industrial centre and port;
- create vibrancy that encourages visitors and tourists to linger longer within Exeter;
- provide a permeable built form with good connections to an enhanced Exe Riverside Valley Park;
- retain and enhance the biodiversity of the Canal Basin and adjacent areas’.

It goes on to identify that development in the Water Lane Regeneration Area should:

- take a comprehensive approach to the delivery of development which ensures that new housing is compatible with other existing land uses in the area, particularly industry;
- provide a mix of uses that encourage vitality and create a safe and secure environment;
- include innovative modern design that respects the form and massing of existing development, to enhance the character of the area;
- address the issue of flood risk through design and layout;
- aim to connect to a heat supply from the Marsh Barton EfW facility’.

Emerging Local Plan

The SPD has been prepared to align with both the principles and requirements of policies KP6 and C17 and more up to date national planning policy. The principles and requirements set out in national planning policy are reflected in the Liveable Exeter 2040 Vision, which in turn underpins the emerging Local Plan (The Exeter Plan) expected to be adopted in 2025. Once the Exeter Plan is adopted, the Water Lane Development Framework and Design Code will either form a SPD in support of the new policy or will potentially form part of the Exeter Plan itself. The chosen approach will be subject to updated government guidance on SPDs and Design Codes.

The Exeter Plan proposes to allocate Water Lane as a development site and is subject to consultation as a full draft plan in autumn 2023, alongside the Water Lane SPD. The local community are also working on the early stages of a neighbourhood plan within the area.

1.3 Liveable Exeter

By 2040 Exeter will be a global leader in addressing social, economic and environmental challenges. Commitment to transformational change and sustainable growth is underpinned by the 2040 Exeter Vision, which has been endorsed by a series of key stakeholders in the city.

2040 Exeter Vision

The 2040 Exeter Vision will achieve the following seven 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

Driven entirely by achieving these outcomes, Exeter City Council has embedded the Vision into the (draft) Exeter Plan across all key policies and development sites. The Plan works alongside Liveable Exeter to deliver the 2040 Vision.

Liveable Exeter is an ambitious city-making initiative to regenerate brownfield land and build new homes within healthy and vibrant new neighbourhoods. It is the brilliant alternative to building on green spaces and strives to protect Exeter's unique characteristics, including its landscape setting and rich cultural heritage.

Brownfield development is enshrined in the development strategy for the Exeter Plan. There is a need to use land more efficiently and increase densities at strategic brownfield developments, including at Water Lane.

Liveable Exeter takes a fresh approach to growth, looking to renew the city in ways which benefit people, the environment and the economy.

A liveable city

A liveable Exeter combines the strengths of a global city with a local character, including:

- Exeter's rich heritage
- The River Exe and the surrounding countryside
- Internationally recognised places to work and study

The network of neighbourhoods that make up the city, such as St. Thomas, St. Leonards and Whipton, retain some of the qualities of the small villages that once surrounded the city wall. Together, these distinct qualities create the foundations of a liveable city.

As Exeter plans for growth, it is essential to recognise where there is room for improvement. For example:

- The streets, spaces and parks that link neighbourhoods and key destinations like the city centre need to be safe and attractive, encouraging people to be active and use cars less.
- The institutions and businesses that give Exeter strength and status need to be recognised and supported to respond to shifts in the digital, economic and social landscape.
- That investment and funding achieved through transformational development and infrastructure renewal projects will be how the Vision outcomes are achieved.

A set of high-level Liveable Exeter Principles have been developed to guide new development and infrastructure projects across the city and ensure changes in the built and natural environment deliver the outcomes of the Exeter Vision 2040.

The SPD builds on the work undertaken within the Water Lane Principles document which expresses Exeter City Council's aspirations for the redevelopment of the site.

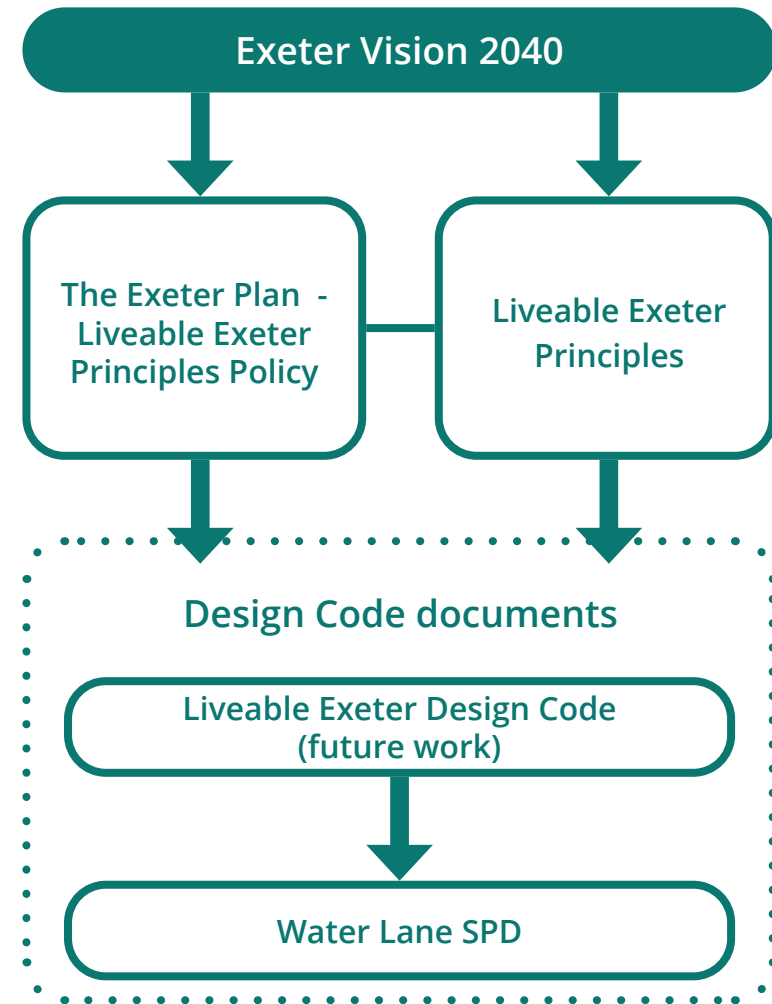


Diagram explaining the hierarchy of council documents related to Liveable Exeter.

Liveable Exeter Principles

Memorable places

Exeter has strengthened its relationship with key features that define the image of the city including the River Exe, the City Centre and the surrounding hills.

Outstanding Quality

Exeter has high-quality and net zero carbon living, working, learning, leisure, cultural and historic environments which help to attract top businesses and the best talent.

Welcoming neighbourhoods

Exeter is made up of a network of compact and well-connected neighbourhoods where people can access day to day services such as care, schools, work and social spaces by walking and cycling.

The Liveable Exeter Principles are tools to contribute to delivering the outcomes of the Exeter Vision 2040. The 7 themes capture the outcomes Exeter is seeking to achieve.



Connected Culture

Exeter has a diverse and accessible cultural offering, connecting our world leading climate science, arts and literature, heritage, learning and innovation.

Spaces for people and wildlife

Exeter's urban and natural spaces are attractive and well-connected environments well used for recreation, active travel and for supporting wildlife.

Active Streets

Exeter has transformed into a city with high-quality streets where active travel, public transport and shared mobility are the natural and most convenient choice for most journeys.

Liveable Buildings

Exeter's new and upgraded buildings contribute to an attractive city and are well-designed spaces where people enjoy spending time.

1.4 Using the SPD

The purpose of the SPD

This SPD builds upon the Water Lane Principles document setting out a Vision for Water Lane, and outlining requirements and precedents for applicants coming forward with development proposals. The purpose of this document is to help ensure development proposals are well designed and achieve the Vision when delivered.

Comply or Justify

The requirements and guidance within the SPD reflect local stakeholders' aspirations for Water Lane and development is expected to follow these. Where a proposal departs from the requirements and guidance, a thorough justification should be provided and demonstrate how it still supports the Vision for Water Lane.

Page 304

Who the SPD is for

The SPD will form a material consideration for planning applications and should be used as part of the pre-application process. The document is intended to be used by a wide range of stakeholders, with the main users set out below:

Applicants: The SPD is intended to give designers, developers and landowners applying for planning consent a clear steer on what is expected of development proposals. It provides a common starting point and vision to work towards.

Planning Officers: The SPD will be a tool for planning officers to guide applicants through the pre-application and planning application process and ensure proposals meet the requirements in the SPD.

Planning Committee: The SPD will also be used to inform Councillors during their decision making at Committee to ensure applications that are approved meet the requirements in the SPD and support the Vision for Water Lane.

Residents and stakeholders: The SPD provides a framework to achieve high quality design and placemaking and as such will provide residents and local stakeholders with certainty on the design standards new development should meet.

The SPD is also an important strategic tool for stakeholders to determine priorities for infrastructure delivery and improvements. More details on this is set out in Chapter 5.

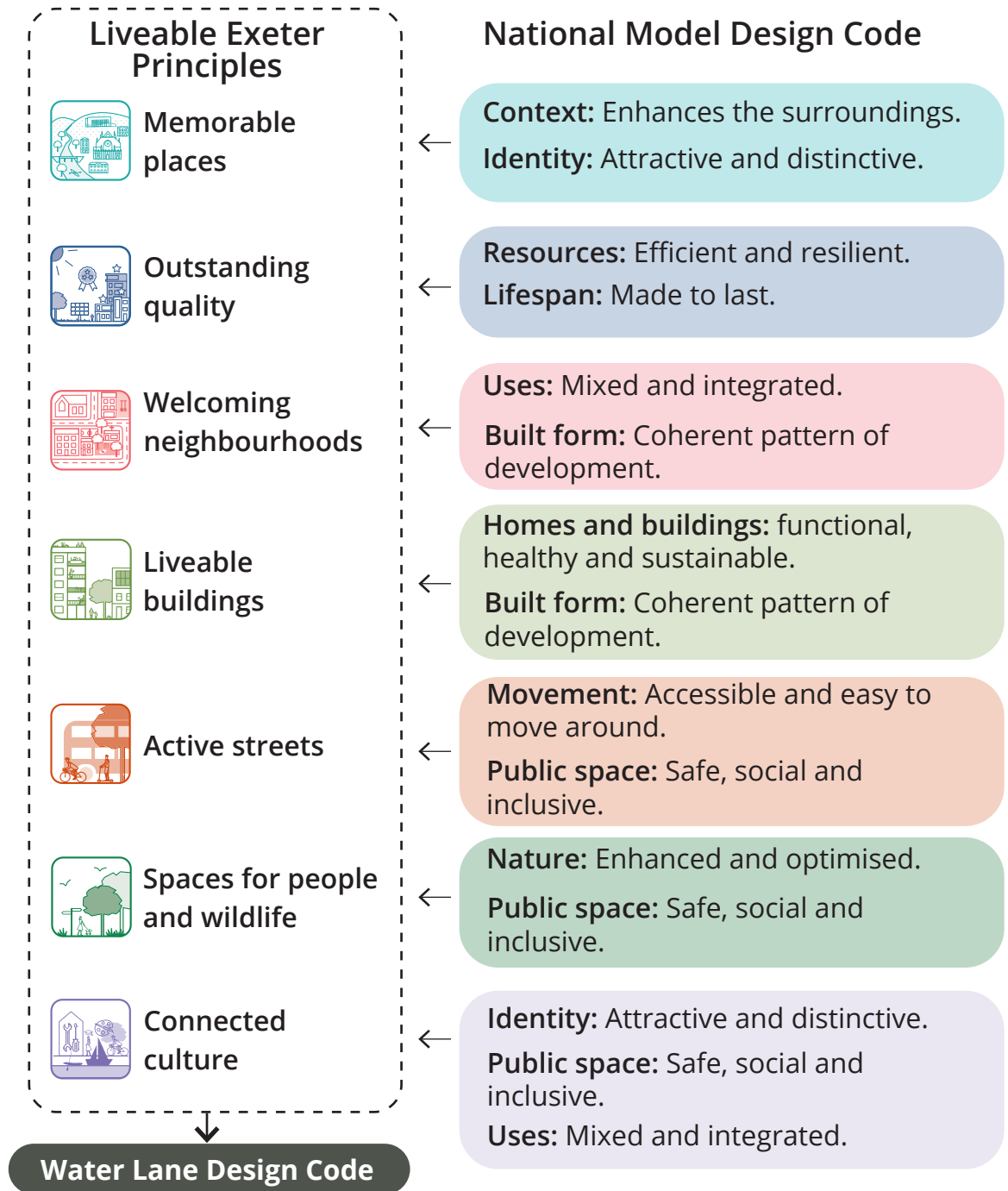
How the Design Code is structured

The Design Code section of the SPD is structured around the Liveable Exeter Principles, setting out how development at Water Lane should respond to each Principle, ensuring a clear thread between Exeter’s overarching vision, Local Plan Policy and the SPD.

The topics covered under each Liveable Exeter Principle are informed by the Government’s National Model Design Code (NMDC). The Principles and requirements within the Code have also been informed by the following initiatives:

- Garden City Principles.
- Sport England’s ten principles of Active Design.
- Building for a Healthy Life.
- 10 Healthy Streets Indicators.

This diagram shows where the NMDC topics are covered within the Code. A more detailed mapping of the NMDC topics and outcomes are included in the appendix.



How the Design Code is structured - sample pages

This document is intended to be a practical and usable tool for all parties involved in the design and planning process in Water Lane. The Code sets out both specific design requirements as well as required processes that should be followed to arrive at a good design solution. This allows flexibility for applicants to adhere to the Code in a number of different ways. Requirements are supported by examples of how this can be achieved.

All code requirements have a code number and are set out within coloured boxes.

W02 - Neighbourhood Centre

A neighbourhood centre should be provided broadly as shown on the land use framework plan on page XX and be:

- Well connected to the whole neighbourhood as well as the wider area
- On the Neighbourhood Street that connects the Canal at Gas Works Place with Water Lane (the street)
- Set back from the waterfront and near Water Lane (the street), creating a distinct destination
- Adjacent to the Mobility Hub

The Neighbourhood Centre should incorporate sufficient non-residential uses to support a vibrant centre and area. A minimum of 1996sqm GIA non-residential uses is expected.

Suitable non-residential uses include (but are not limited to) GP surgery/ health centre, primary school, community facilities, local shops, workplaces, gym and mobility/delivery hub. A convenience food store should be provided of approximately 360-600sqm GIA.

It is expected that non-residential uses are predominantly located on the ground floor with residential uses above to make efficient use of land.

The Neighbourhood Centre should incorporate a local green space. Further requirements for this space are set out in SXX.

Graphics and precedent images show examples of how the Code requirement can be achieved. These do not represent the only acceptable design solution.

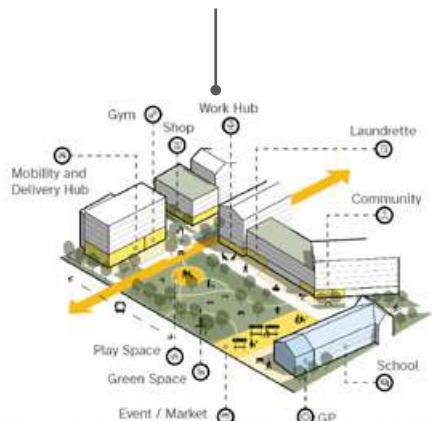


Diagram showing example of what neighbourhood centre could look like and the uses it could include.



Mixed-use neighbourhood centre with active uses on ground floor and residential above, North West Cambridge

Text on white background is supporting text to provide additional detail.

Central zone - Water Lane (the street)

In addition to the general requirements for the central zone, proposals on Water Lane (the street) must consider the following. Refer also to the active streets chapter for further details.

L08 - Central zone, Water Lane frontages and building line

All buildings should have active frontages with windows and frequent building entrances onto Water Lane.

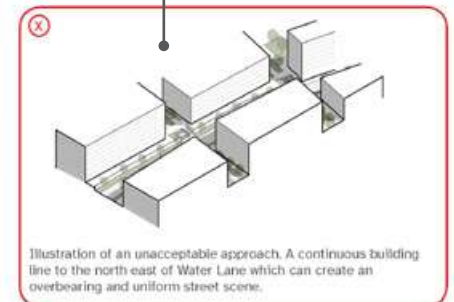
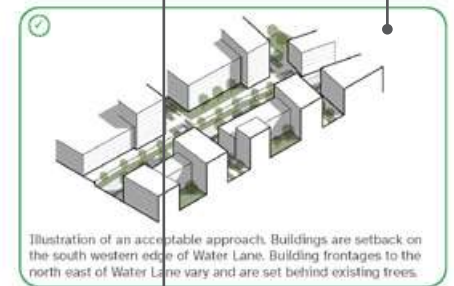
Building frontages must be setback along the south western edge of Water Lane to allow for street trees and avoid over shading of the street. The building line must allow at least a 1:1 ratio between street width and building height.

Building frontages should vary to the north eastern edge of Water Lane. The building line should respond to the specific context such as being set back behind existing trees. This will create a varied built form and avoid an overbearing continuous massing. Occasional buildings which come forward to meet the existing stone wall or level change may be acceptable in specific locations a suitable location.

L09 - Central zone, Water Lane height

Proposals must respond to the level difference between the two sides of Water Lane so that buildings on higher ground are not overbearing on the street. Appropriate responses include lower building heights, greater setbacks and setback upper storeys to achieve a 1:1 street height to width ratio.

In some instances, graphics and images show both an example of what is acceptable (✓) and unacceptable (✗).



Chapter 2

Vision

2.1 Water Lane - the opportunity

Water Lane is an exciting and totally unique development opportunity for Exeter. It is located by the River Exe and Riverside Valley Park, which are valued landscapes and noted tourist and leisure destinations. It has an incredibly rich industrial and maritime heritage and is still a functioning harbour with a strong identity. And it is a 15 minute walk from the City Centre and served by two train stations. It is currently underutilised and disconnected from other parts of the city, providing an opportunity to rethink connectivity in Exeter starting with walking and cycling.

Page 308 Most importantly, Water Lane and the surrounding area have a strong and enterprising local community that is passionate about its future. That local community, made up of people living in the area, people running or working in local businesses and people visiting the area from other parts of the city, have been instrumental to shaping the Vision for Water Lane and determining the requirements in the SPD through early engagement. For instance, the idea of a true waterside community, which is one of the key placemaking principles guiding the SPD, has come from the Friends of the Ship Canal.

The wishes of the local community, expressed during early engagement, are captured in the collage on the following pages. A more detailed description of the community engagement process and input gathered is set out in chapter 6.

Graphic representation of key opportunities within the Water Lane area.



Improved opportunities for getting out on the water, and facilities for boats



A vibrant place to work, learn, play and relax



A community built around walking, cycling and wheeling



Celebrating identity and historical landmarks



15 minutes' walk from the city, connected to Devon and the country by two train stations



A strong sense of community and belonging



40 hectares of accessible Riverside Valley Park within a short walk

High quality sustainable apartment living by the water



The collage on the following two pages shows a mix of site photos from Water Lane to highlight some of the great opportunities within Water Lane, and precedent images from other places to describe what the area could be like in the future.

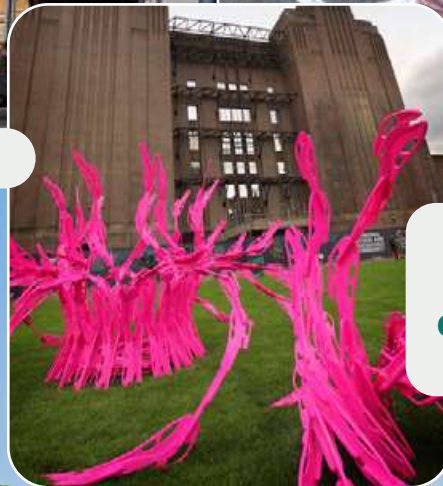


"Safe for children to run around"



"Clean water in the Canal and River"

"Living with the City Centre and the Valley Park on the doorstep"



"The most exciting opportunity in Exeter"



"A legacy for generations to come"



"Able to see Haldon Hill"





"Tranquil and peaceful, vibrant and full of life"



"Nature, space, light and water"



"I spot herons and kingfishers all the time"



"Easy to get onto the water"



"It's a close-knit community where you know your neighbours"



"Safe from flooding and pleasant during heatwaves"



"A fantastic walk from Marsh Barton station to the City Centre"



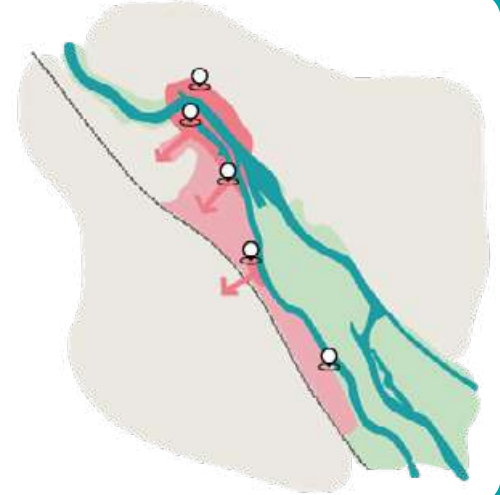
2.2 Water Lane placemaking principles

These seven placemaking principles in this section describe what each of the Liveable Exeter Principles mean for Water Lane. The principles are used to structure the Code to ensure all requirements help to achieve the Vision. Each placemaking principle is expanded upon later in the Code.

1

Memorable places - A true waterside community

The Canal and River define the cultural identity of, and life in, Water Lane.



3

Welcoming Neighbourhoods - A new exciting neighbourhood

People living in Water Lane are personally invested in the community and feel a strong sense of belonging.



2

Outstanding Quality - Exeter's flagship development

Water Lane is an award winning development known nationwide as an exemplar outstanding quality, low carbon neighbourhood.



4

Liveable Buildings

- Responsive density and height

Compact development and taller buildings are provided in the right places and in a way that is responsive to context and local heritage.



5

Active Streets

- A low car and healthy neighbourhood

It's easy to move around on foot, by bike and by public transport within Water Lane and to get to the rest of the City



6

Spaces for people and wildlife

- Connecting with the Canal, River and Valley Park

Abundant planting in streets and spaces together with green walls and roofs create a rich and joined up natural network.



7

Connected Culture

- A dynamic maker community

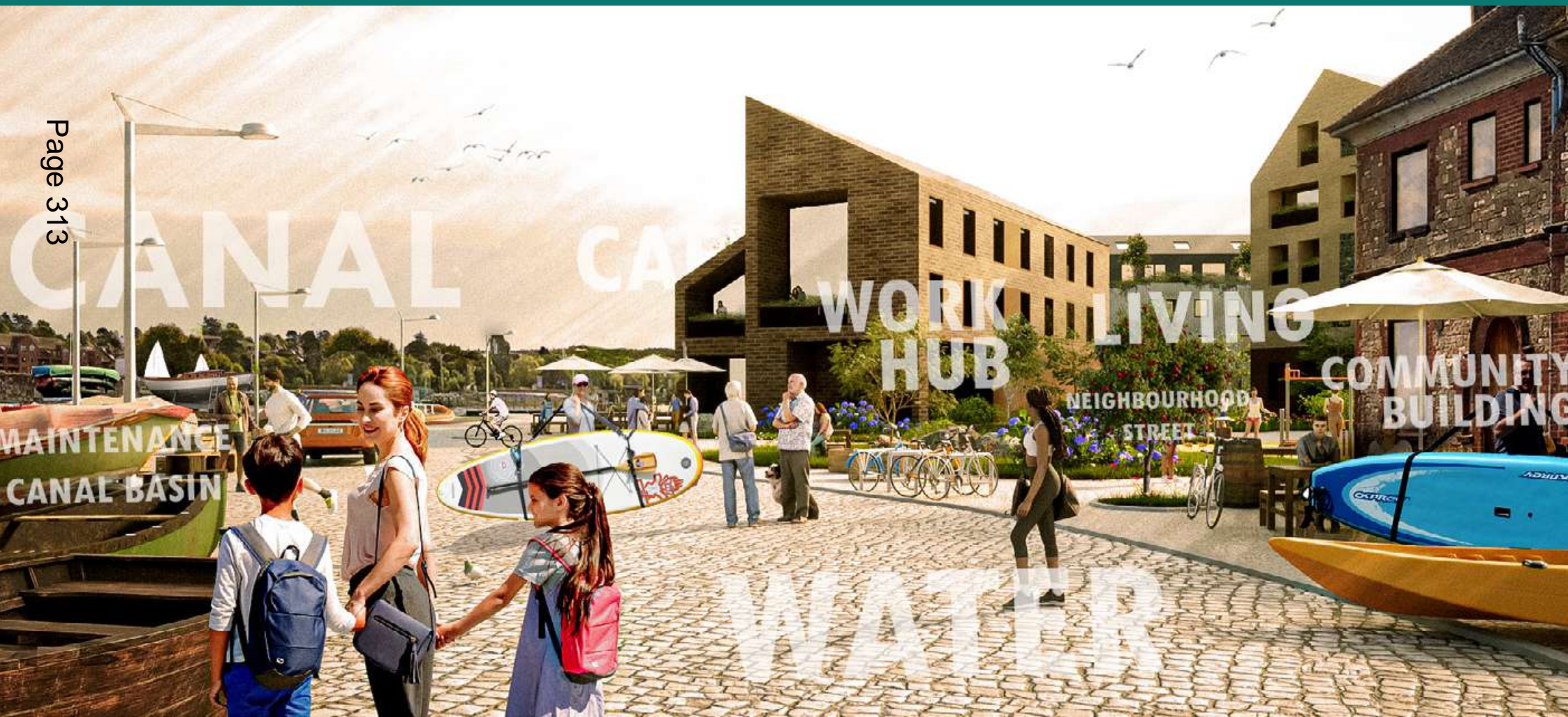
Water Lane provides opportunities for cultural attractions and creativity, building on the diverse community of businesses, and industrial heritage.



2.3 Water Lane Vision

Water Lane is a truly unique neighbourhood in Exeter and its regeneration has been a catalyst for transformation across the City. The River and Canal are at the heart of people's daily life and a cherished destination for everyone in Exeter. Water Lane is a dense and urban neighbourhood where people live and work with both the bustling Quay and the leafy, tranquil Canal on their doorstep. The high density of buildings is matched by an abundance of nature within all streets and spaces and on buildings.

Part of Water Lane's charm is how it has grown organically over time, there is a rich and unpolished mix of uses and buildings which create a strong local identity. Industrial heritage and the working Canal are celebrated and support new cultural uses. Once an isolated area, Water Lane is now well-connected to the rest of the City and a neighbourhood where people choose to walk and cycle, thanks to the attractive streets, bridges and easy access to local facilities.



Chapter 3

Development Framework

Page 314

3.1 Development Framework Overview

The Development Framework provides an illustrative spatial overview of development within the Water Lane site. It provides a co-ordinating structure to the whole development area to guide individual planning applications. The Development Framework represents the spatial application of the Vision and has been used throughout the preparation of the SPD to test aspirations for the site. The Development Framework comprises a build up of the following layers, each of the layers, each of which are explained and expanded on within the Design Code:

Mobility

- see 'Active Streets'



Land Use

- see 'Welcoming Neighbourhoods'



Green infrastructure

- see 'Spaces for People & Wildlife'



3.2 Illustrative Development Framework

St Leonard's Church

St Leonard's

Growing Haven Banks

County Hall

Gas Works Place

The Neighbourhood Street

Mobility hub for all modes

A new green space for the community

A new primary school (preferred site)

St Thomas

Exeter's high-line

The active travel spine

A vibrant waterside space at Gabriel's Wharf

Riverside Valley Park

Streets with planting and raingardens

Solar farm

An outdoor activity hub accessed by train

Marsh Barton Station

Gateway station to the Valley Park

Marsh Barton

A wildlife, nature and renewable energy opportunity

Alphinbrook

Chapter 4

Design Code

4.1 Code contents

A reference for all requirements within the Code is set out in the following list, which can be used as a checklist. Code requirements which only apply to specific locations are highlighted with a bold 'S'.

4.3 Memorable places

- M01 – Contextual analysis
- M02 – Local engagement
- M03 – Character and cultural identity
- M04 – Relationship with the River and Canal
- M05 – Key views
- M06 – Historic and existing features

4.4 Outstanding quality

Global city qualities

- Q01 – Global city qualities

Resources

- Q02 – Zero carbon
- Q03 – Site analysis and community engagement
- Q04 – Energy hierarchy
- Q05 – Passive and climate responsive design
- Q06 – Local clean energy networks
- Q07 – SMART grid and infrastructure
- Q08 – Renewable energy
- Q09 – Air quality and pollution
- Q10 – Water hierarchy
- Q11 – Materials and waste hierarchy

Sustainable construction

- Q12 – Embodied carbon
- Q13 – Resilience
- Q14 – Building performance standards
- Q15 – Flood risk

Lifespan

- Q16 – Stewardship and governance
- Q17 – Development coordination

4.5 Welcoming neighbourhoods

Land use and activity

- W01 – General land use and activity
- W02 – Land use plan
- W03 – Neighbourhood centre **S**
- W04 – Primary school **S**
- W05 – Water related uses
- W06 – Housing mix
- W07 – Employment opportunities
- W08 – Existing uses
- W09 – Utilities

Water spaces

- W10 – Gas Works Place **S**
- W11 – Garbriel's Wharf **S**
- W12 – Clapperbrook Hub **S**

4.6 Liveable buildings

Built form and scale	
L01 - Building density	
L02 - Street ratio	
L03 - Building heights	
L04 - Northern canal, height and massing	S
L05 - Northern canal, frontage	S
L06 - Canal basin, height and massing	S
L07 - Canal basin, frontage	S
L08 - Central zone, height and massing	S
L09 - Central zone, frontages	S
L10 - Central zone, Water Lane frontages and building line	S
L11 - Central zone, Water Lane height	S
L12 - Southern zone, height and massing	S
L13 - Southern zone, frontage	S
Site wide codes	
L14 - Housing space standards	
L15 - Daylight	
L16 - Ventilation and dual aspect	
L17 - Relationship with existing buildings	
L18 - Noise	
L19 - Accessible homes	
L20 - Flexible homes	
L21 - Storage	
L22 - Raised ground floors	
L23 - Public, private thresholds	
L24 - Non-residential ground floors	

4.7 Active streets

Movement and connectivity	
A01 - Mobility strategy	
A02 - Mobility strategy plan	
Site wide codes	
A03 - General requirements for design of streets and junctions	
A04 - Public transport	
A05 - Primary mobility hub	S
A06 - Primary mobility hub functions	S
A07 - Secondary and tertiary mobility hubs	
A08 - Car parking	
A09 - Cycle and mobility parking	
A10 - Safe access and egress	
Street codes	
A11 - Mobility coding plan	
A12 - Water Lane, role and function	S
A13 - Water Lane, managing level change	S
A14 - Water Lane, access and movement	S
A15 - Neighbourhood Street	S
A16 - Haven Road/Maritime Court	S
A17 - Foundry Lane	S
A18 - Tan Lane	S
A19 - Michael Browning Way	S
A20 - Northern site access	S
A21 - Green Streets	S

A22 - Green Lanes	S
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Site connections

A23 - Canal crossings

A24 - Canal tow path

A25 - Railway crossings

A26 - Off-site connectivity and improvements
--

4.8 Spaces for people and wildlife

Site wide codes

S01 - Green infrastructure plan

S02 - Open space

S03 - Green and blue infrastructure

S04 - Biodiversity

S05 - Urban Greening Factor

S06 - Sustainable Drainage Systems

S07 - Trees

S08 - Planting

S09 - Play

S10 - Food growing

S11 - Residential open space

Public spaces codes

S12 - The community green space	S
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S13 - Canal	S
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S14 - Railway embankment	S
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S15 - Grace Road fields	S
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4.9 Connected culture

C01 - Culture-led development

C02 - Public realm place making

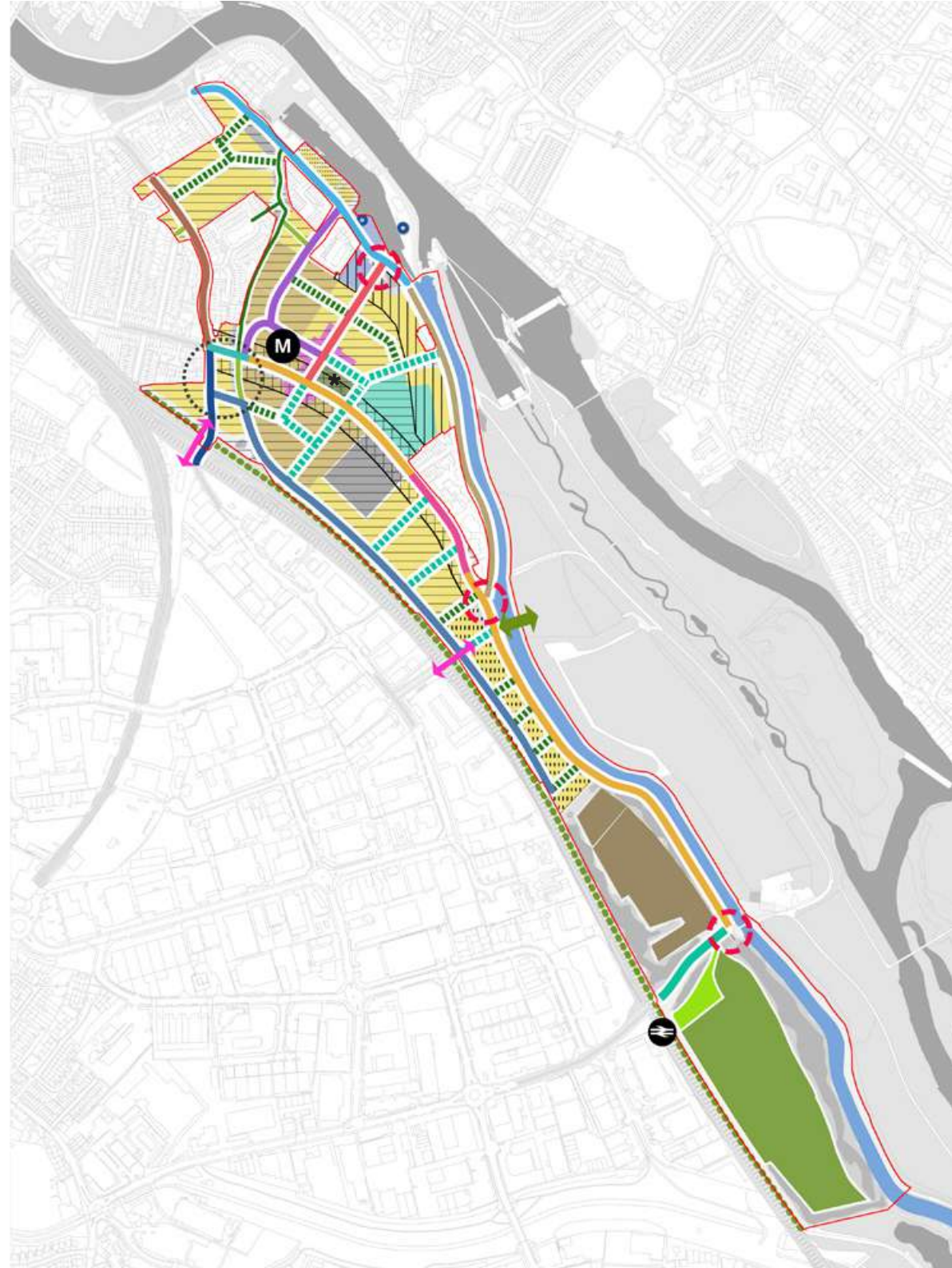
C03 - Creative industries

C04 - Meanwhile uses

C05 - City culture hub











4.2 Regulating plan

The regulating plan describes the specific spatial requirements of the Code within the Water Lane area. It can be used to help identify which spatial Codes are relevant to specific parcels of land and therefore individual planning applications. A legend is provided on the following page.



Regulating plan legend






Welcoming neighbourhoods

-  **Neighbourhood centre**
W03
-  **Residential led development**
Multiple codes apply
-  **Water Spaces**
W10-12
-  **Primary school**
W04, Preferred location
-  **Employment opportunity area** W07
-  **Boat storage**
W05, Preferred location
-  **Craning point**
W05, Fixed location
-  **Solar farm, biogas plant and green waste**
Q09, W08, Fixed location
-  **Car parking for leisure hub**
W12, Fixed location
-  **Electricity substation**

Liveable buildings

Built Form Zones













Covering detail of building frontages, massing and articulation of height.





-  **Northern canal zone**
L04-05
-  **Canal basin zone**
L06-07
-  **Central zone**
L08-09
-  **Central zone water lane** L10-11
-  **Southern zone**
L12-13

For height requirements refer to L03 building heights coding plan.





For density requirements refer to L01 building density coding plan.

Active streets

-  **Water Lane zone 1**
A12-14, fixed location
-  **Water Lane zone 2**
A12-14, fixed location
-  **Water Lane zone 3**
A12,14, fixed location
-  **Water Lane zone 4**
A12,14, fixed location
-  **Neighbourhood Street**
A15, Fixed location
-  **Foundry Lane**
A17, Fixed location
-  **Haven Road**
A16, Fixed location
-  **Michael Browning Way**
A19, Fixed location
-  **Tan Lane**
A18, Fixed location
-  **Green Streets**
A21, Indicative location
-  **Green Lanes**
A22, Indicative location
-  **Canal path**
A24, Fixed location

-  **New canal bridge**
A23, Indicative location
-  **Railway underpass**
A25
-  **Primary mobility hub**
A05, A06
-  **Northern site access**
A20

Spaces for people and wildlife

-  **Local green space**
S12
-  **Grace Road fields**
S15
-  **Canal**
S13
-  **Railway embankment**
S14



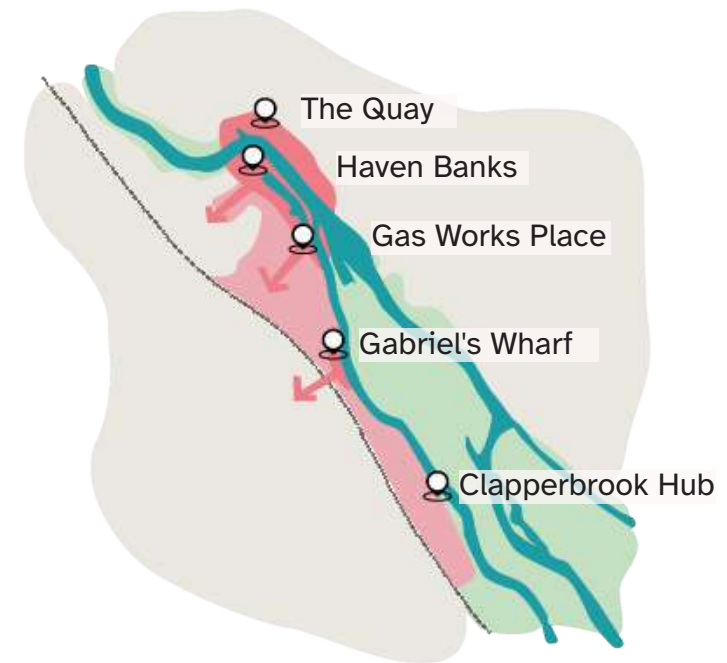
4.3 Memorable places

The City-wide ambition: Exeter has strengthened its relationship with key features that define the overall image of the City including the River Exe, the City Centre, and the surrounding hills.

A true waterside community

Page 323
Future Vision for Water Lane: The Canal and River define the cultural identity of, and life in, Water Lane. They root the neighbourhood in a wider waterside quarter: the Quay, Haven Banks and the Valley Park. The water is more than a pretty backdrop, it's an essential part of daily life. It's easy to access the water and people can enjoy paddling on the Canal and walking along the towpaths. New waterfront spaces are busy with people getting their buoyancy aids on, cleaning paddleboards and repairing boats. The industrial and maritime past of the harbour and Canal Basin, as a trading hub, is celebrated through an enterprising community spirit.

Walking through the area you catch glimpses of the Canal and streets with lush raingardens leading towards the water. Standing on the waterfront, you can fully appreciate Exeter's panorama with the Cathedral and church spires amongst clusters of trees and buildings.



Sense of place

‘A sense of place is the quality that makes a place special and lodges it in the memory so that people want to stay or return’ - National Model Design Code

Whilst all elements of this code work together to create a strong sense of place, this section sets out specific requirements relevant to creating a ‘true waterside community’. It starts with a deep understanding of the unique character and identity of Water Lane, what’s important to the local community and Water Lane’s role in the City and region.

Water Lane has a strong community but the area lacks coherence and legibility and its pockets of homes are dispersed. The following codes set out the key unique features which development proposals need to focus on to create a legible and memorable Water Lane.

Subsequent sections of the Code describe how places should be planned to feel vibrant and streets and public spaces designed to add to the identity of the area.

Page 324



Contextual Analysis

Water Lane has an established local community and a rich history which has shaped its relationship to the River, the city and the wider countryside. It is important that proposals understand the needs and aspirations of local people and sense of place at Water Lane.

M01 – Contextual analysis

Applicants must demonstrate a comprehensive analysis and understanding of the local and city-wide context and how these have shaped the development proposal from the outset. This analysis must include (but not be limited to) the relationship with: the River and Canal, Haven Banks and the Quay, Marsh Barton, St Thomas, the City Centre, landmarks such as the Cathedral and St Leonard’s church, natural features such as groups of trees, the Riverside Valley Park and the green hills surrounding Exeter.

M02 - Local engagement

Applicants must engage with the local community and local stakeholders at an early stage to understand their aspirations for the area and set out how the development proposals have been informed by these aspirations and will provide positive benefits for the local community. Community events that are aimed at simply explaining and defending a proposal will not be sufficient.

Character and cultural identity

M03 – Character and cultural identity

Applicants must demonstrate a comprehensive understanding of the historic and cultural identity of the local area including (but not limited to) the area's industrial and maritime heritage and its current role and function as a working harbour and a regional destination. Refer also to the Connected Culture chapter for requirements relating to cultural placemaking.

Water play, London Olympic Park



The River Exe, Riverside Valley Park and Exeter Ship Canal are regional destinations and some of the most important areas for Exeter. They are places for many uses including: walking, running, cycling, paddling and dinghy sailing. It is important that proposals enhance these assets and ensure that Water Lane remains an attractive destination long-term, both for local people and people coming from further afield.

M04 – Relationship with the River and Canal

Proposals must improve Exeter's relationship with the River and Canal. This should be achieved by:

- Drawing the influence of the water into the character of streets and spaces of Water Lane.
- Providing new waterfront buildings and public spaces which place greater emphasis on the River and Canal.
- Providing internal and external space for water-related activities including access to the water. Further detailed requirements are provided in 'Welcoming Neighbourhoods'.
- Improving connections to the waterfront, along the waterfront and across the Canal and the River. Public access along the full length of the Canal must be maintained and improved.
- Framing views through the development to the waterfront with frequent gaps in the built form.

Key views

Wherever you are in Exeter you catch glimpse views of landmarks such as the Cathedral and church spires and of the green surrounding hills. In Water Lane there is an opportunity to strengthen the area's character by both retaining and creating new glimpse views. This visibility plays an important role in creating memorable places by giving a strong sense of the position of Water Lane within the City.



M05 - Key views

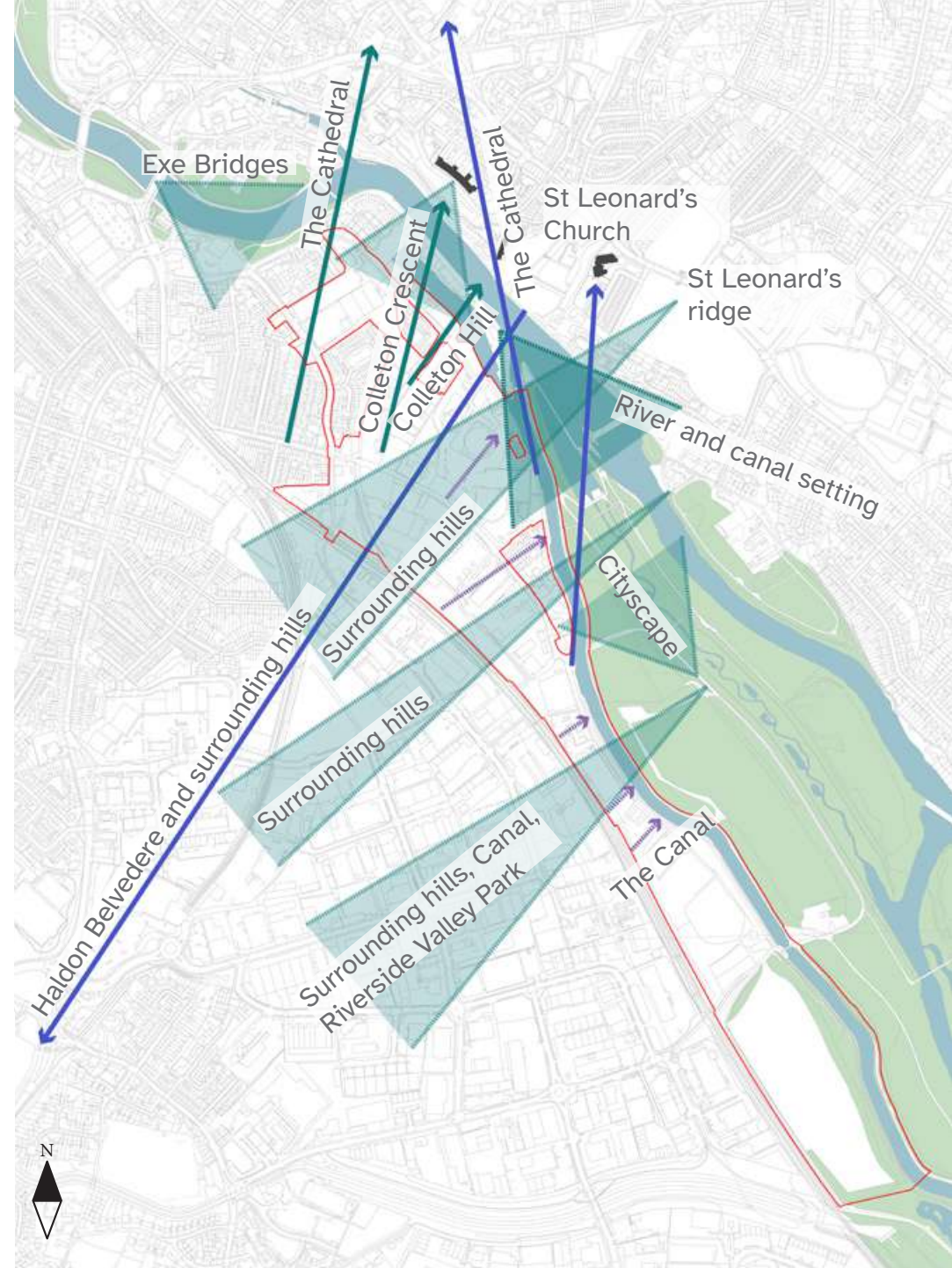
Development proposals must map and analyse views to and from the site and consider how to best retain existing and create new glimpse views.

Development proposals must retain and consider views as shown on the 'Views Framework Plan'. These views provide a starting point and there may be others to consider. All views to be considered should be agreed with the Council at an early stage. A Landscape and Visual Impact Assessment (LVIA) should be used as a design tool to inform development proposals and not only at the end of the process.

View of the Cathedral from Gabriel's Wharf



-  Water Lane area boundary
-  Views to retain
-  Views to consider
-  Indicative wider views to consider
-  Indicative short Canal views to consider



Views Framework Plan showing views to key landmarks and features

Integrating historic and existing features

M06 – Historic and existing features

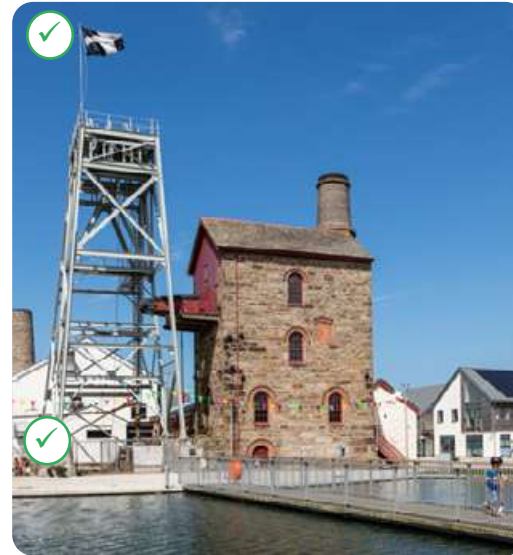
Development proposals should retain and re-purpose existing buildings, features and materials where these positively contribute to the character and identity of the area. The setting of nearby historic buildings should be respected.

The Quay Climbing Centre within the former electricity works building must be retained and it's setting respected. Development should also respect the setting of the historic listed warehouses on the Canal Basin.

The Gas Works former Social Club building must be retained and positively incorporated into the development. Proposals should aspire to retain other features that add character and identity.



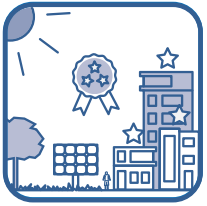
Gas Works former Social Club



Retained industrial feature and contemporary extension contributing to cultural identity, Trevenson Rd, Cornwall



Re-use of warehouse building for workplaces, Baltic Triangle Liverpool



4.4 Outstanding quality

The City-wide ambition: Exeter has high-quality and net zero carbon living, working, learning, leisure, cultural and historic environments which help to attract top businesses and the best talent.

Page 328 Exeter's flagship development

Future Vision for Water Lane: Exeter has positioned itself as one of the country's leaders in responding to the climate emergency. Water Lane has played a key role with its innovation in net zero buildings and energy technologies and setting a high-quality precedent for a low-car, nature-rich urban neighbourhood.

Water Lane has also become an amazing and exciting gateway to the water and helped make the Canal, River and Valley Park an outstanding destination which people visit from all across the City and the region.

Water Lane has won multiple awards for its high quality buildings, great streets and spaces and the approach to placemaking which has successfully overcome many big challenges.

All of this has happened thanks to a huge effort and exciting new collaborations between all stakeholders including Exeter City Council, Devon County Council, the local community, the University of Exeter, Exeter College and developers.



Global city qualities

Overarching opportunities and objectives

At the heart of Liveable Exeter lies the aspiration to combine the strengths of a global city with local qualities. Exeter is a great city that often punches above its weight. It is one of the most successful locations for investment in the UK and has an emerging knowledge economy particularly with strengths in environmental and life sciences. People from all over the UK are choosing to make their lives in Exeter and it is attracting talented and committed people from other leading cities. Some of Exeter's institutions and initiatives are internationally important and widely recognised. The world class research in environmental intelligence and climate science at the University of Exeter, the Met Office and Exeter Science Park, uniquely positions Exeter as a global leader in tackling the climate emergency and achieving Net Zero. Demonstrating how to deliver Net Zero on the ground, Exeter has also successfully built the UK's first Passivhaus leisure centre.

To continue to grow successfully, it will be important to recognise the qualities that make Exeter a great city as well as significantly improve the places across the city which are reducing the city's appeal. Exeter needs outstanding gateways, be it St David's or Marsh Barton, that express the high quality and high aspirations of the city. The city also needs to remain compact with attractive streets and spaces that link neighbourhoods and key destinations, where people choose to walk and cycle. And the major institutions and business' that give the city its strength and status need to be recognised and supported to respond to shifts in technology, shopping patterns, and social dynamics.

'Outstanding Quality' sets out the requirements that will help make Water Lane a flagship development contributing to Exeter's global city qualities, with a particularly strong focus on Net Zero.

Q01 - Global city qualities

Water Lane should be a new neighbourhood of outstanding quality. Development proposals should demonstrate aesthetic excellence and aspire to award-winning quality of design across all scales of design.

Development proposals must capitalise on the opportunity to make Water Lane an outstanding gateway to the Canal, River and Riverside Valley Park and enhance the area's attraction as a destination of regional importance.

Water Lane should be a low car neighbourhood, taking advantage of its central location, offering a new type of healthy, low carbon living, learning, leisure and working environment for Exeter.

Development proposals are encouraged to explore opportunities to collaborate with the University, the hospital, the College and other key institutions to find opportunities for innovation and creating award-winning development as well as providing improved physical connections, facilities and appropriate house types.

Development proposals must explore opportunities to provide exciting education, research, skills, work and leisure destinations in prominent and accessible locations.

Resources

Overarching opportunities and objectives

Water Lane can create a transformational shift in how resources such as water, energy, power and materials are used in the area. Currently the building stock and utility infrastructure across the area is largely inefficient, uncoordinated and limited in capacity. The use of resources is based on a linear system with minimal recycling, renewable and low carbon resources. Instead, there is an opportunity to move to a sustainable stewardship of resources with a circular system where rainwater is harvested, power is generated and used on-site and excess heat and waste is re-used. This stewardship of resources will require integrated resource systems across Water Lane, where all resources are considered together.

Page 330 Water Lane also needs to be designed to be resilient for the long term. This includes eliminating the use of fossil fuels, improving energy and water efficiency in buildings, providing renewable decentralised energy and adapting the neighbourhood to climate change. This will help address the challenges people are facing such as fuel poverty.

The key objectives for the Water Lane resource strategies are to:

- Minimise resource consumption and carbon emissions by adopting hierarchical approaches in the design of buildings, infrastructure, streets and spaces.
- Set and embed best practice sustainable construction standards to deliver high levels of performance through every stage of the lifecycle across design, construction and operation, underpinning the other six Liveable Exeter principles.

The Codes and precedents on the following pages set out how these objectives can be achieved.



Integrated energy, water and waste resource strategies embedded into Hammarby Sjöstad, Sweden

Net Zero Exeter

The planet is facing huge environmental challenges caused by human interventions which are increasing carbon dioxide (referred to as carbon in this SPD) and other greenhouse gas emissions. In recognition of this, Exeter City Council (ECC) declared a climate emergency and have adopted the Net Zero Exeter 2030 Plan which sets out what Exeter will need to put in place to be net zero carbon by 2030. Water Lane is Exeter's flagship development and one of the City's most important opportunities for achieving the Vision.

Q02 - Zero Carbon

Development proposals should support Exeter's ambition to be net zero by 2030 through each of the following:

- 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 Sustainable Drainage Systems (SuDS) and other nature-based solutions to deliver flood risk management.
- Providing green infrastructure, biodiversity net gain and landscape-led schemes.

Development proposals are also encouraged to:

Delivery of net zero-carbon, affordable heat and hot water to residents and businesses at Elephant Park, London



- Limit carbon emissions over the development's lifetime.
- Exceed local and national planning policies wherever feasible.
- Provide a 'Pathway to Net Zero Carbon' aligning with recommendations of the Net Zero Exeter 2030 Plan, best practice guidance such as the 'UKGBC Net Zero Carbon Buildings Framework' and wider UK strategies including the Energy Security and Net Zero strategies.
- Provide a 'Whole Life Carbon' assessment in detailed proposals for major development, covering carbon emissions resulting from the materials, construction and use of buildings over their entire lifetime, including demolition and disposal.
- Minimise disturbance of soil to avoid releasing stored carbon into the atmosphere.

Contextual analysis and engagement

Q03 – Site analysis and community engagement

Applicants must demonstrate that:

- A comprehensive site analysis has been undertaken which has informed the overarching resource strategies, including energy, water, materials and waste management.
- Proposals take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- Opportunities for resource stewardship and integrated strategies, including energy, water, materials and waste management, have been a central part of engagement with the local community and other key stakeholders.
- Proposals address community and stakeholder aspirations and provide positive benefits for the local community.

Passive design approaches were central to delivering the 'Carbon Neutral' community at BedZed, Sutton, South London. ©Tom Chance



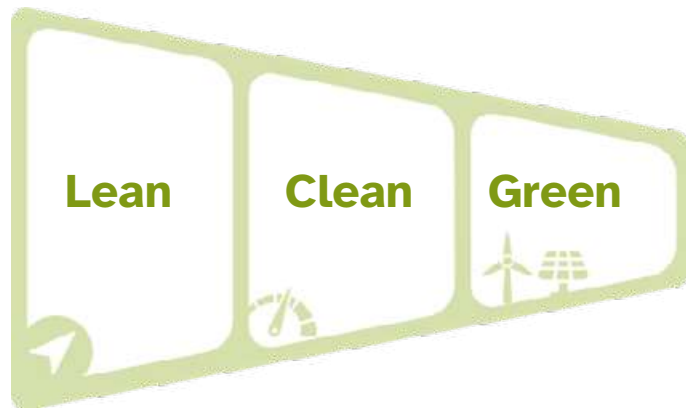
Energy strategy

The Code for Water Lane minimises energy use and resulting carbon emissions in order to create an exemplar sustainable and low carbon neighbourhood.

This is achieved by employing the energy hierarchy approach. This approach supports minimising energy demand from the outset, utilising both passive (lean) and active (clean) measures which are more cost-effective than high capital cost energy generation systems. Following reduction of demand through lean and clean measures, low and zero-carbon technologies ('green' measures) should then be considered to further reduce the development's carbon emissions and ensure they are resilient to external influences on energy supply and unit cost.

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Water Lane: Energy Hierarchy



Low carbon energy strategy and district energy network embedded from the outset at Queen Elizabeth Olympic Park, London



Q04 - Energy hierarchy

Development proposals should adopt the following key principles as part of embedding the energy hierarchy to achieve the Water Lane Vision:

1. LEAN - Use less energy

- Apply passive design principles, optimising building massing, form and orientation to maximise seasonal 'free' heating and cooling, whilst reducing overheating risks and the need for reliance on comfort cooling.
- Apply a fabric first approach that minimises building space heating demands by embedding high air tightness and building fabric insulation and construction standards.
- Optimise glazing ratios to create a highly insulated building envelope whilst providing good levels of natural daylight.
- Utilise findings from best practice post-occupancy evaluation case studies to inform and incentivise sustainable behaviour change.

2. CLEAN - Supply energy efficiently

- Incorporate Energy Efficiency Measures including high efficiency building services systems, ventilation systems with heat recovery such as MVHR, and high performance LED lighting.
- Incorporate connection to local decentralised energy networks. First connect on-site, otherwise connect to existing networks. If neither is possible allow for future connections.
- Incorporate SMART grid and building infrastructure including metering, controls, appliances, energy storage and electric vehicle charging systems. Carry out and share post-occupancy evaluation studies publicly.
- Address unregulated energy consumption and carbon emissions, through incorporating high efficiency white goods and equipment and SMART controls.

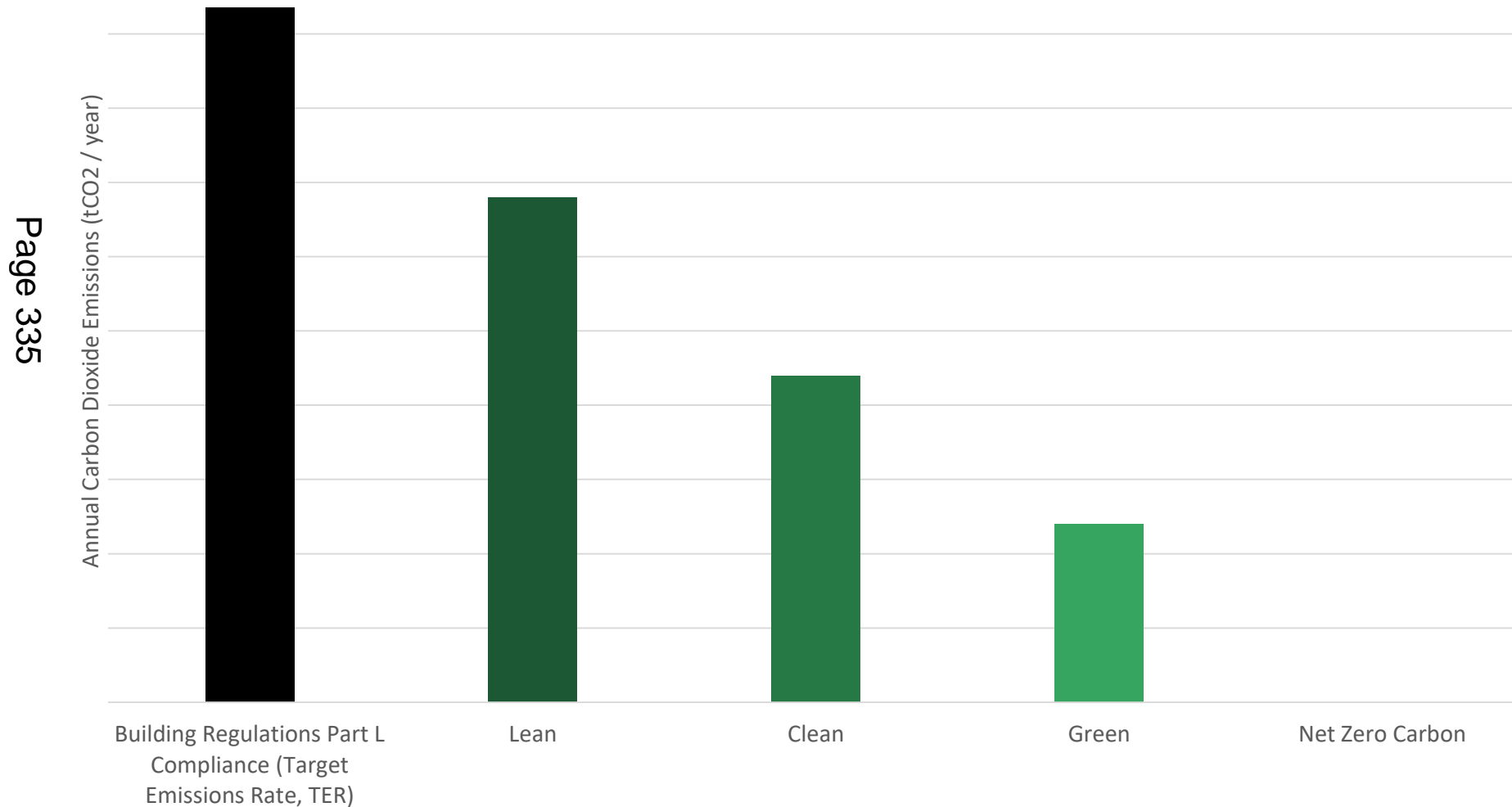
3. GREEN - Use Renewable Energy

- Incorporate low and zero-carbon technologies including renewable energy systems, making use of those with the highest energy generation potential on-site in the first instance.
- Once all potential on-site low and zero-carbon technologies have been pursued, consider opportunities for near/off-site renewable energy supplies (e.g. renewable energy power purchase agreements) and then offsetting residual carbon emissions as a last resort, through responsible and certified schemes.

Example 'Pathway to Net Zero Carbon' in Operation

The graph provides an example 'Pathway to Net Zero Carbon' in operation as set out in Code Q02, based on the annual carbon emissions for development proposals. This shows how reductions in the annual carbon emissions can be achieved through adopting the key principles of the 'Lean Clean Green' energy hierarchy covered

under Code Q04. The pathway starts with the minimum required to achieve compliance with the 'Target Emissions Rate' (TER) of Part L of the Building Regulations applicable at the time the Code was prepared.



Passive, climate responsive and efficient design

Q05 – Passive and climate responsive design

Development proposals must consider opportunities to utilize passive and climate responsive design approaches, and natural resource systems on-site, from a neighbourhood to plot and building scale. These should include:

- Maximising passive solar heat gain whilst mitigating overheating risk.
- Maximising solar access where possible for incorporation of solar technologies to generate energy on-site and reduce the primary energy required.
- Demonstrating how the wind climate has been considered in development proposals and mitigation measures incorporated, for example to address potential detrimental impact on pedestrian comfort.
- Proposals informed by embedding microclimate analysis using software approved by an industry body, such as CIBSE.
- Designing building and public spaces to respond to predicted winter and summer temperatures, for example through the use of shading, landscaping, ventilation and shading devices such as colonnades to ensure pedestrian comfort. Proposals should explore creative and innovative designs which can set a high quality benchmark for Exeter.



The Climate Innovation District in Leeds (above) was designed as a powerful response to climate change through embedding passive and climate responsive design techniques, harnessing the sites natural resources and delivering highly energy efficient and resilient homes.



Knight's Place, Exeter. Delivering sustainable development embedding Passivhaus standards.

Local clean energy networks and smart infrastructure

Decentralised energy networks and smart infrastructure can support a Net Zero Carbon Water Lane, particularly when considering existing and proposed development and through collaboration between stakeholders. On average, standard centralised power generation, which provides power through the grid to most properties, is only 30% efficient, whereas decentralised generation is typically twice as efficient.

Q06 – Local clean energy networks

New development (either new build or conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more dwellings, will be required to connect to any existing, or proposed, Decentralised Energy Network in the locality to bring forward low and zero carbon energy supply and distribution. Otherwise, it will be necessary to demonstrate that it would not be viable or feasible to do so. Where this is the case, alternative solutions that would result in the same or better carbon reduction must be explored and implemented, unless it can be demonstrated that they would not be viable or feasible.

Development proposals are also encouraged to collaborate with ECC and other leading organisations, such as the Devon Climate Emergency Response Group, at an early stage to explore innovative solutions for local energy networks.

Q07 – SMART grid and infrastructure

Development proposals should explore opportunities to:

- Develop a coordinated clean energy and mobility strategy.
- Implement SMART controls, metering, appliances and technology in all properties across Water Lane, to support efficient use of energy and other resources.
- Deploy SMART grid technology and interconnected infrastructure to maximise the benefits of local energy networks, on-site generation and storage. This should include electric charging infrastructure for vehicles, bicycles and scooters.
- Ensure data on resource consumption and on-site energy generation is captured and shared publicly, to inform consumers and contribute to research and development e.g. by the University of Exeter.
- For a digital platform that integrates multiple sources of data for example traffic, air quality and energy which enables residents, businesses and ECC to make informed decisions about their activities.

Renewable energy

Renewable sources of energy include sun, wind and water power, ground and air source heat pumps, biomass energy from organic matter, energy from waste, landfill and sewage gas. These can offer diversity and security of supply and can reduce harmful emissions to the environment.

Q08 – Renewable energy

Development proposals should maximise opportunities for on-site renewable energy generation, utilising innovative technologies.

Proposals for renewable technologies should be space efficient and integrated into buildings in the first instance, including wall and roof mounting.



Photovoltaic array installed at Exeter's Mary Arches car park which has provided for a carbon positive building.

Air quality and pollution

Q09 – Air quality and pollution

Development proposals should:

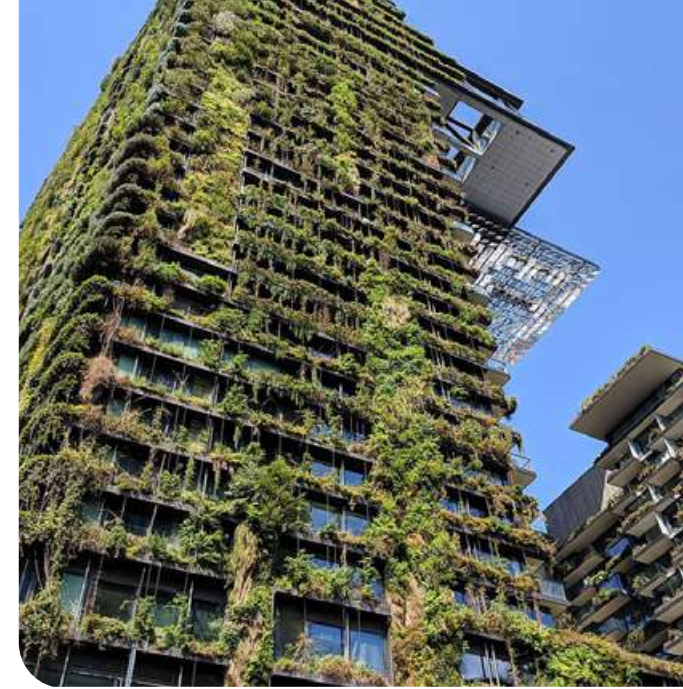
- Ensure that all electricity generated and consumed on-site is from clean energy sources and adopt a 'zero fossil fuel combustion' approach (unless technically unviable) to reduce/eliminate the risk of greenhouse gas emissions and air pollution.
- Minimise emissions and light, dust, vibration and noise pollution, and where possible, contribute to the improvement of local environmental conditions.
- Achieve good indoor air quality using best practice approaches, and accreditations such as BREEAM and the WELL Building standard.
- Explore opportunities to integrate a network of air quality sensors.

Water strategy

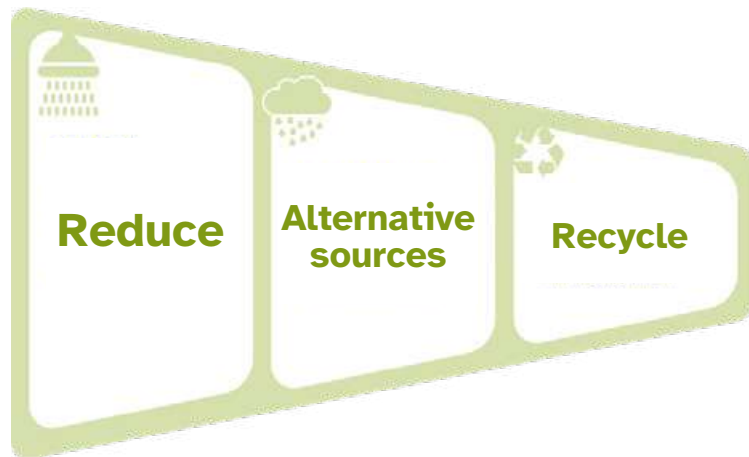
The Code aspires to dramatically reduce water consumption and meet a large proportion of the neighbourhood's water needs through captured rainwater and recycled water. This will create a positive impact on the wider catchment area, reduce the reliance on potable water supply from the municipal network and set a new benchmark for Exeter.

There is an opportunity for recycled water or harvested rainwater to be used for water related uses with additional requirements for non-potable water such as irrigation, flushing of toilets, cleaning e.g. kayaks, canoes and paddle boards etc. There are also ground floor areas within Water Lane not suitable for residential use which may provide an opportunity for water storage.

Innovative water strategy embedded from the outset at Central Park, Sydney. This includes a membrane bioreactor system in the basement of the buildings, providing 50% to 70% of non-potable uses including toilet flushing, washing machine use and garden/ green wall irrigation.
©MDRX



Water Lane: Water Hierarchy



Q10 – Water hierarchy

Development proposals should:

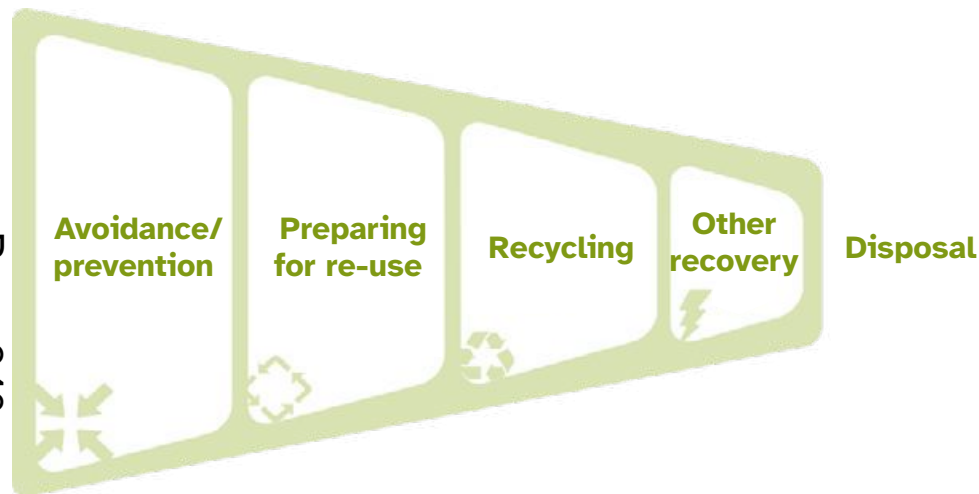
- Adopt the water hierarchy in design development to support the conservation of water supplies and resources.
- Minimise water demand as a priority, before considering efficient fixtures, fittings, distribution, alternative sources for lower grade use and recycling.
- Incorporate water storage, rainwater harvesting and use across all properties wherever feasible.
- For sustainable drainage requirements refer to S06.

Development proposals are encouraged to achieve a minimum water efficiency that requires an estimated water use of no more than 110 litres per person per day.

Materials and waste strategy

The SPD promotes sustainable material selection, use and recycling, minimising waste generated during construction and operation, and sent to land fill.

Water Lane: Waste Hierarchy



Q11 – Materials and waste hierarchy

Development proposals should:

- Follow Devon County Council's Waste Management and Infrastructure SPD.
- Ensure that waste management is considered from the outset and over the development lifecycle.
- Adopt the materials and waste hierarchy to first reduce waste before considering reuse and recycling. This should include selection and management of materials arising from demolition, site excavation and construction.
- Adopt circular economy principles using best practice approaches for example as developed by the Greater London Authority.



The design of Mayfield Park in Manchester has reused and upcycled many of the features that were on site, including the structure for the former culvert now used for the new footbridge constructions. Re-use of existing materials helped to reduce the cost of the park by £20 million.

Sustainable construction

The Code aspires to enable highly sustainable buildings, infrastructure and public realm using environmentally responsible and resource efficient processes. These include selecting materials with low embodied carbon, using modern methods of construction, maximising resilience and high sustainable performance in construction and operation.

Exeter is leading the delivery of both residential and leisure Passivhaus schemes in the UK. Development at Water Lane can use local expertise and knowledge to achieve the highest levels of energy performance.



St Sidwell's Point Leisure Centre, Exeter. The first leisure centre in the UK built to Passivhaus standards.

Q12 – Embodied carbon

Development proposals are encouraged to:

- Select and prioritise low carbon, local and durable materials for construction, reusing existing buildings and materials wherever possible.
- Use innovative, on or off-site modern methods of construction that minimise the development's embodied carbon and promote a circular economy.
- Calculate the impact on climate change from carbon emissions embodied in development materials, using a nationally recognised carbon assessment method, such as the UKGBC 'Net Zero Carbon Buildings Framework'.
- Demonstrate that the embodied carbon has been minimised.

Q13 – Resilience

Development proposals should:

- Be designed and built to function well over the development lifetime to be resilient to climate change and minimise vulnerability. The performance standards required should be considered from the outset to ensure they can be achieved post-completion.
- Minimise resource consumption, including energy, water, materials and waste.
- Use appropriate design, layout, orientation, landscaping and materials.
- Integrate renewable technologies and SuDS wherever possible.
- Enable people and goods to travel by modes that are low or zero-carbon and less vulnerable to increase in fuel prices, such as walking, cycling and public transport.
- Consider regenerative building design and landscaping that are resilient to climate change over the development's lifetime.
- Enable future connections to local energy networks and energy centres/utility hubs, using best practice principles such as the National Joint Utility Group.
- Design infrastructure that is resilient to climate change, prioritising nature-based solutions to managing flooding wherever feasible. See Q18 for specific reference to flood risk.



Climate resilience has been central to the design of Malmo's Western Harbour (Sweden). Nature-based solutions to managing flooding are attractive and integrated within the overall landscape, green roofs slow the run-off from buildings down and large boulders help create an attractive waterfront whilst protecting the neighbourhood from the sea during storms.

Q14 – Building performance standards

Development proposals are encouraged to:

- Adopt the highest sustainability performance standards in all buildings, using certification systems such as Passivhaus, Home Quality Mark or BREEAM.
- State the benchmarks and targets adopted and demonstrate how these will be addressed in the design and throughout the lifespan of the development.
- Achieve a 78% carbon dioxide emissions reduction from that required under the 2013 Building Regulations (applies to residential development).
- Meet national target improvements for Energy Performance Certificates (EPC).
- Ensure high comfort levels within all buildings by minimizing overheating and heat loss, and provide good ventilation using best practice, industry approved modelling software such as CIBSE TM 52/59.

Flood risk

The Water Lane area is predominantly within flood zone 3 and flood risk is a key consideration for development. It has significant impact on the overall design and on a wide range of issues including safe access and egress, ground floor uses and frontages.

Q15 - Flood risk

Flood risk must be considered early in the design process. Development should be designed to provide an adequate response to flooding which is considered safe throughout its lifetime, without increasing flood risk elsewhere.

Vulnerable uses such as residential need to be laid out and designed using flood avoidance measures such as raising finished floor levels above predicted flood levels or using only the upper storeys for habitable areas of housing.

Where low vulnerability uses are located within the flood zone, they should incorporate flood resilience measures in line with best practice for all sources of flooding. This includes consideration of layout of individual units, choice of materials, floor construction, height of electrics etc.

See L22 and L24 for requirements relating to ground floor frontages within the flood zone.

See A10 for requirements relating to safe access and egress.

See A12 for requirements relating to Water Lane (the street).

See S06 for requirements relating to sustainable urban drainage.

Lifespan

For Water Lane to be a successful and outstanding quality neighbourhood, it is crucial that the long-term stewardship and governance is considered from the outset and that development proposals across the area are well coordinated. This will ensure that spaces and buildings are well looked after and resilient to future change. It will also ensure that important infrastructure, such as active travel connections, community facilities and open space are delivered early and in the right place to support the new neighbourhood.

Q16 - Stewardship and governance

Development proposals must clearly describe future management arrangements, including any areas proposed to be adopted by a public authority, or areas under the control of a management company. Proposals should clearly show the difference between public, communal and private spaces.

Development should consider management structures which ensure local governance and maintenance of public and communal open spaces, such as a Trust or Community Interest Company (CIC). The details of such stewardship arrangements will be agreed between ECC, the developers and other stakeholders at the planning stage.

Larger sites should provide frequent public access through developments to ensure pedestrian permeability, as outlined within the Development Framework and A03. Gated developments which do not allow public access to large areas of the site will not be acceptable.

Q17 - Development coordination

Development proposals must demonstrate that they are coordinated with other sites within Water Lane and enable a comprehensive development overall. This includes:

- Taking account of approved and live applications in the area.
- Taking account of the Development Framework and Design Code requirements.
- Considering any shared infrastructure needs, site connectivity and integration with development layouts on adjacent sites.
- Setting out a strategy for coordinated phasing and delivery of key infrastructure.



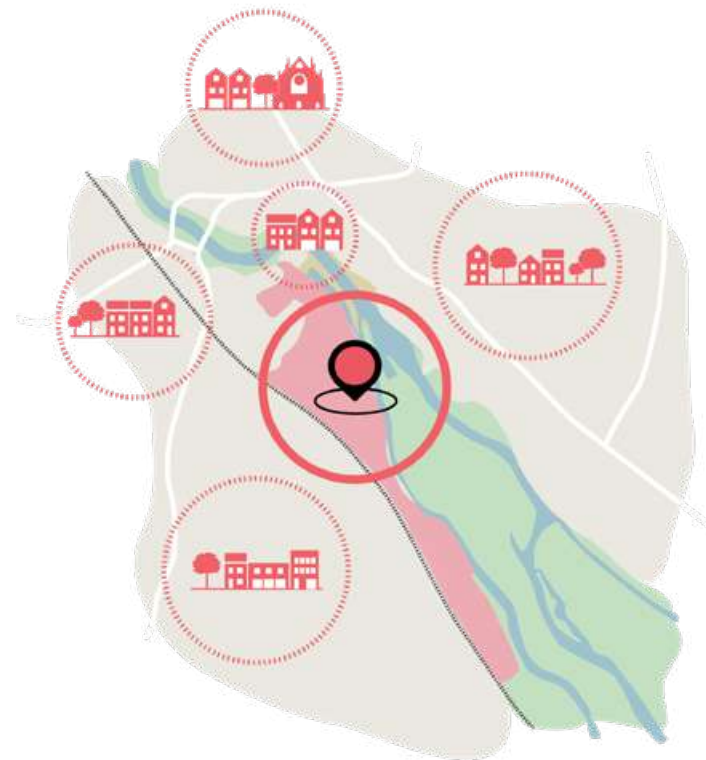
4.5 Welcoming neighbourhoods

The city wide ambition: Exeter is made up of a network of compact and well-connected neighbourhoods where people can access day to day services such as care, schools, work and social spaces by walking and cycling.

A new exciting neighbourhood

Page 345
Future Vision for Water Lane: Water Lane is a new canalside neighbourhood taking its place amongst Exeter's distinctive network of neighbourhoods. Its neighbourhood centre with its award-winning primary school, community green space, work hubs and shops has become the natural gathering place which brings the community together. The many community events held within the neighbourhood centre and on the waterfront spaces show that people are personally invested in the community and feel a strong sense of belonging. It's a welcoming neighbourhood where it's easy to meet and socialise with neighbours and people say hello to each other. Thanks to the many different types of homes, Water Lane has attracted people from all stages of life, from University graduates to families and retirees.

When people want to venture further, it's easy to get to surrounding neighbourhoods and the City Centre by foot, on bike and by public transport.



Land use and activity

W01 - General land use and activity

Development proposals must:

- Accommodate a mix of uses and cater for a broad demographic. Suitable uses include residential, employment uses compatible with residential (as defined in use class E), education, healthcare, food and drink, leisure, culture, heritage centre, community facilities, water-related uses, and space for the charitable sector.
- Deliver important uses including school, public open space, local healthcare provision and Neighbourhood Centre in an early phase to support a successful and cohesive new neighbourhood.
- Coordinate plans and phasing with other proposals across the Water Lane area, as far as possible, to ensure a comprehensive development.
- Help connect and bring together dispersed residential areas into a cohesive neighbourhood with accessible community facilities, diverse homes and high quality open spaces which complement and contribute to the local area.
- Explore the opportunity for cultural space of city wide significance as outlined in C05.



Wapping Wharf Phase 1 Mixed use scheme, integrating new flats and ground floor retail space along Bristol Harbour.



Generous canal side public space as part of a mixed-use urban regeneration at Kings Cross, London.

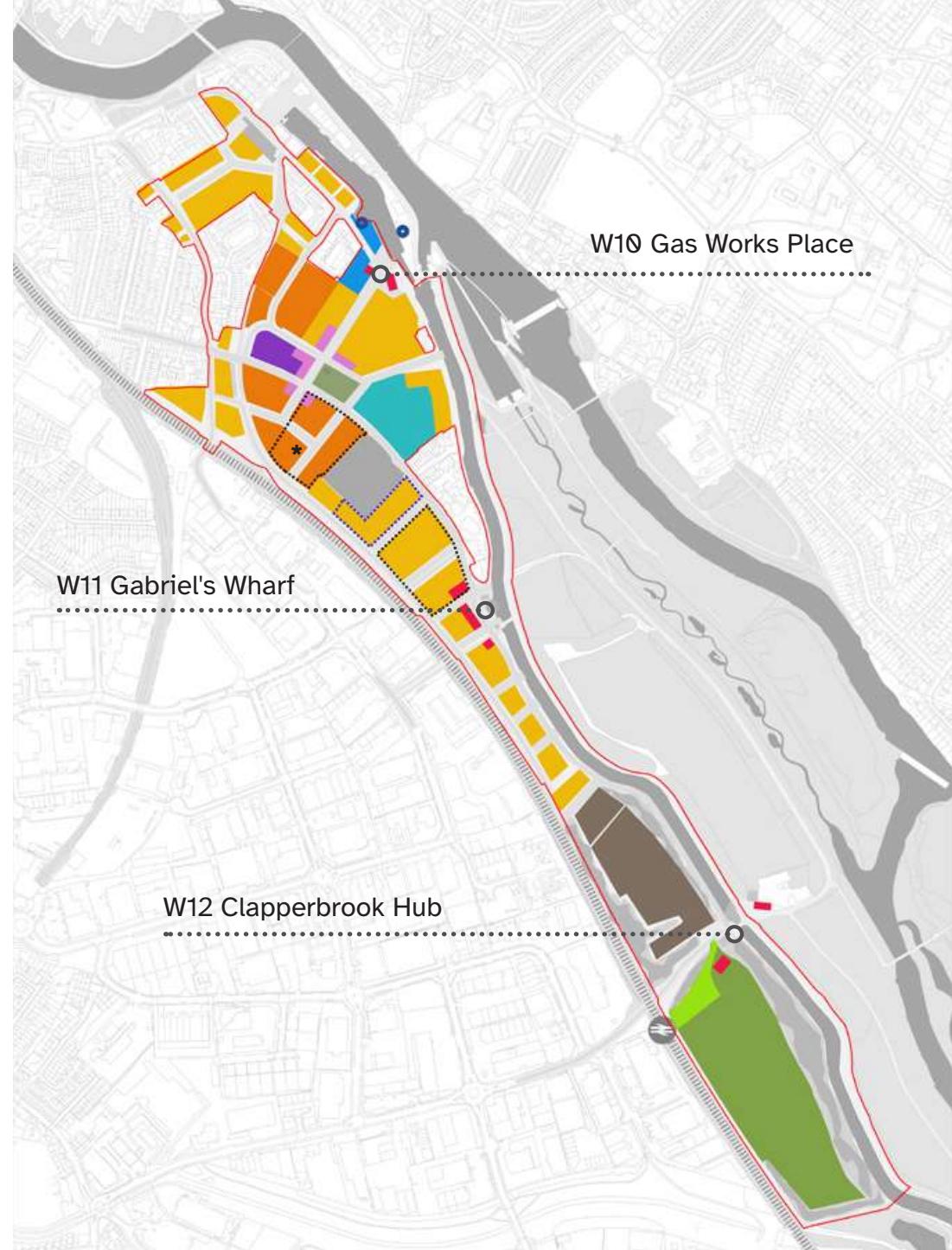
W02 - Land use plan

Distribution and location of uses should broadly follow the land use plan unless a more suitable arrangement is demonstrated.

Legend

- Neighbourhood Centre (W03)
- Water spaces (W10-12)
- Mobility and delivery hub (A05-06)
- Preferred primary school site (W04)
- Alternative options for Primary School
- Opportunity for Higher Education
- Residential led development
- Employment opportunity area (W07)
- Grace road fields, wildlife, nature and renewable energy opportunity site (S15)
- Solar farm, bio gas plant and green waste site (Q09)
- Car parking for leisure hub (W12)
- Boat storage (W05)
- Craning point (W05)
- * Local green space (S12)
- Electricity substation

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Land use plan

W03 - Neighbourhood Centre

A Neighbourhood Centre should be provided broadly as shown on the land use plan and be:

- Well connected to the whole neighbourhood as well as the wider area.
- On the Neighbourhood Street that connects the Canal at Gas Works Place with Water Lane (the street).
- Set back from the waterfront and near Water Lane (the street), creating a distinct destination.
- Adjacent to the mobility hub.

The Neighbourhood Centre should incorporate sufficient non-residential uses to support a vibrant centre and area. A minimum of 175m of non-residential active frontage is expected, focused on the western side of the local green space and Neighbourhood Street as described in the land use plan.

Suitable non-residential uses include (but are not limited to) GP surgery/ health centre, primary school, community facilities, local shops, workplaces, gym and mobility/delivery hub. A convenience food store should be provided of approximately 300-600sqm GIA.

It is expected that non-residential uses are predominantly located on the ground floor with residential uses above to make efficient use of land.

The Neighbourhood Centre should incorporate a local green space. Further requirements for this space are set out in S12.

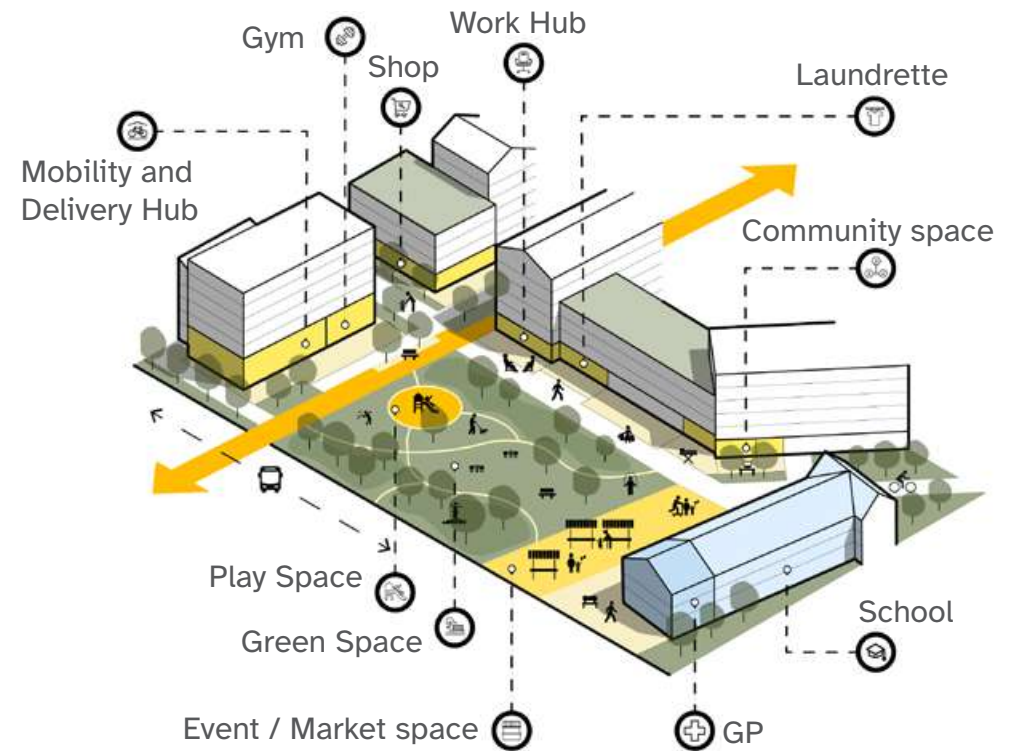


Diagram showing an example of what the Neighbourhood Centre could look like and the uses it could include.



Mixed-use neighbourhood centre with active uses on ground floor and residential above, North West Cambridge



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The Neighbourhood Centre and local green space provides a well connected, mixed use centre for Water Lane.

W04 - Primary school

A two-form entry primary school with early years provision and space for a children's centre should be provided at Water Lane. The school should provide a playing pitch, hard play area, outdoor classroom areas and preferably areas for forest school or wildlife areas. This will be balanced with a compact form appropriate to the central location and proposed higher density development. The school should incorporate minimal on-site parking provision and utilise the proposed mobility hub to make best use of land. Refer to the active streets chapter for further mobility hub details.

The school should be located adjacent to or near to the Neighbourhood Centre and must contribute to the street. This could include a prominent entrance and co-locating community uses with windows facing the street.

Three options have been identified for the school location. The preferred option to support successful placemaking is a portion of the former Gas Works site to the east of Water Lane, as this is closest to the neighbourhood centre and incorporates existing mature trees. Alternative options include to the north or south of the electricity substation on the western side of Water Lane.

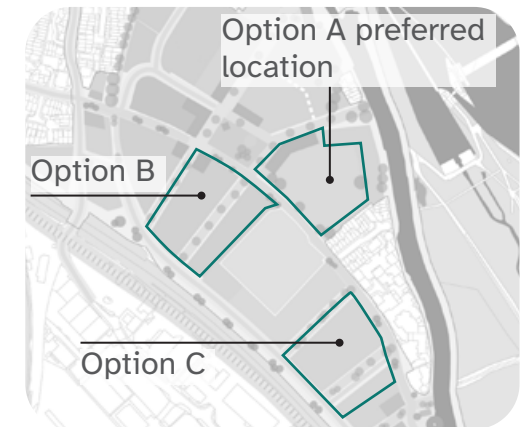
The size of the school site is to be determined through discussions between applicants, Devon County Council and Exeter City Council.

Site constraints including, but not limited to, safe access and egress, contaminated land and proximity to existing utilities, including the high pressure gas main and electricity substation, will need to be addressed.

Montgomery School in St Thomas incorporates a range of outdoor play and social spaces within a relatively compact urban site. There may be opportunities for further consolidation at Water Lane including reduced car parking.



Diagram illustrating preferred close relationship between the primary school and the neighbourhood centre.



Primary School location options, site areas are shown indicatively.

Water related uses

The Canal Basin is a working harbour and is actively used by businesses, organisations, schools and individuals. Water related uses are essential for Water Lane to be a true waterside community, where the water plays an active role in the life of the neighbourhood rather than just being a pretty backdrop to development. There are many interventions identified by local stakeholders that could make the Canal an even more attractive feature for the local area and the city. These include:

- A new slipway that enables small and medium vessels to get into the water.
- Clean water in the Canal.
- Multiple smaller pontoons along the Canal to allow access to the water in more locations.
- A water-related community hub with space for boat building and maintenance.
- Boat and equipment storage.
- Changing facilities.
- Car parking in the right places for those that bring their own equipment.
- Opportunities for water taxis between Marsh Barton Station, the Quay and Canal Basin.

A selection of these features may come forward in future.

Paddle boarders on the Canal, Exeter

W05 - Water related uses

Public access must be maintained across the whole length of the Canal. Suitable development setbacks are shown in L05, 07, and 13.

Development proposals along the Canal should provide space suitable for water-related uses in places where there is or can be good access to the water.

Applicants must engage with users of the Canal and River and Exeter City Council at an early stage to understand their aspirations and requirements and define how the development proposals can best support these. This should include engagement with the Friends of the Exeter Ship Canal, the Exeter Canal and Quay Trust, the Canal user group and watersport association.

Development proposals must allow sufficient space to safeguard the function of the working harbour, ensure good access to the Canal for water-related uses and ensure the use of the Canal can increase in the future.

At least one craning point must be provided in the area that enables larger vessels to access the water. This could either be accommodated by strengthening the existing craning point at the West Quay, or retaining a craning point at Gabriel's Wharf.



Housing mix

W06 – Housing mix

Development must provide a mix of housing which caters for a broad demographic and takes account of local needs, including for affordable housing. This should be reflected in the type, size and tenure of housing proposed as well as its associated amenity space. This mix should include homes suitable for families, key workers, people with additional needs, care leavers, younger people, students, elderly, downsizers, and custom build housing.

Housing typologies that are dedicated to a narrow demographic such as student housing, co-living or retirement living must not dominate the area. Developments must demonstrate they are future proofed to support alternative uses by illustrating alternative layouts.

There is a need for homes for older people, including extra care housing, in Exeter. Applicants must liaise and collaborate with relevant local authorities to explore how the development can best support this need.

Family housing in urban apartment context

Apartments in an urban context can provide suitable homes for families if designed well. The most successful precedents are typically well designed, with good daylight levels; have communal green space with opportunities for doorstep play; easy access to local shops, play areas and nursery/school; some car parking is provided for private car or car club; and sufficient bike and buggy storage provided in convenient locations. Refer to the liveable buildings chapter for detailed housing design requirements.



Hortsley retirement accommodation in an urban context, Seaford, West Sussex. ©RCKa/Jacob Spriestersbach



Apartment blocks which cater for a broad demographic including families with easy access to play and open space, Malmo, Sweden

Employment opportunities

Water Lane provides an exciting opportunity to create a unique mixed-use area with space for a broad range of employment uses that can be co-located with residential. Proposals can use the highly accessible and sustainable location to support workplace travel plans.

Water Lane has an important relationship with Marsh Barton and as such it can act as a catalyst for wider regeneration with more efficient and creative use of land and existing buildings. Due to the flood risk, there might be areas where it is not suitable to have residential at ground floor, which presents a great opportunity to provide space for a broad range of less vulnerable uses.

W07 – Employment opportunities

Development proposals should incorporate space for employment uses that are compatible with residential, with a particular focus within the ‘employment opportunity areas’ identified on the land use framework plan and where ground floors aren’t suitable for residential use due to site constraints. Types of employment spaces could include work hubs, collaborative workspace, live-work units and spaces for maritime employment uses.

Ground floors should have floor-to-floor height of at least 3.5m and flexible floor plates to accommodate a broad range of non-residential uses and changes over time including leisure, offices and workshops.

Proposals are encouraged to provide existing levels of employment floor space.

Ground floor workshop space with residential above, Caxton Works, London



W08 – Existing uses

Applicants must consult with existing businesses and organisations in the area to explore opportunities to provide space which caters for their future needs.

Development proposals should explore opportunities to re-purpose existing buildings where suitable to provide affordable space for businesses and other organisations.

Applicants must engage with relevant authorities including ECC and DCC as waste collection and waste disposal authority respectively, with regards to the nearby strategic facilities including the energy from waste facility, and the Exton Road material reclamation facility.

W09 – Utilities

Proposals must consider opportunities for the strategic consolidation of utilities infrastructure. Relocation of existing services and provision of new services must be coordinated to provide positive placemaking outcomes with consideration for the wider area. Proposals must accommodate existing strategic infrastructure where this is not proposed to be relocated, for example along Water Lane (the street).

Water spaces

W10 - Gas Works Place

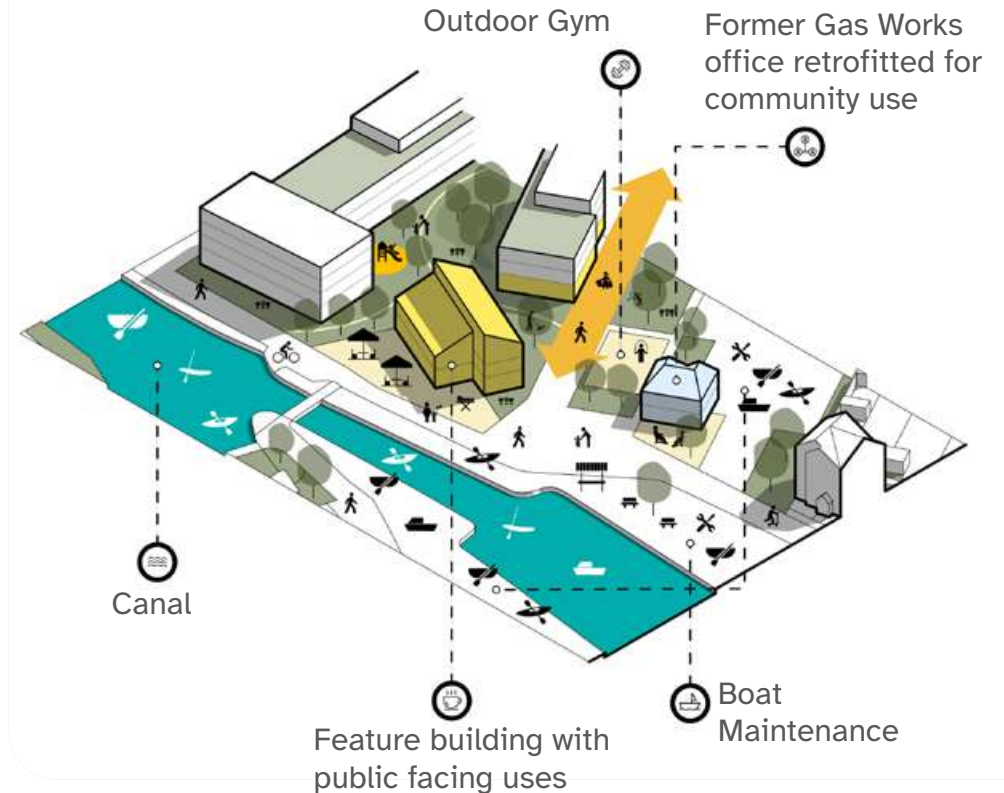
A local node should be provided adjacent to the former Gas Works office, broadly as shown on the land use framework plan.

Development should re-purpose the former Gas Works office as a water related community hub. This could include a relocated canal office, Sea Cadets and other water related uses. The adjacent area could be provided for boat storage and maintenance. Other non-residential uses could include local shops, cafés, heritage centre and chandlery.

The space forms part of the Neighbourhood Street which connects the Canal Basin to the Neighbourhood Centre and will be an important gateway into the new development. There should be opportunities for street trees, planting and 'play on the way' features. Vehicle access should be limited to service access only from Maritime Court, refer to the active street chapter for further details.

There is an opportunity for a feature building which has active frontages on both the Neighbourhood Street and Maritime Court/ the Canal. The form of this building should be carefully considered to ensure the massing is broken down and it is responsive to framed views of St Leonard's Church from the Neighbourhood Street. Public facing uses such as a heritage centre or other water related uses should be considered for this site.

High quality public realm and re-purposed industrial buildings, Gloucester Docks.



Illustrative view of one development option for Gas Works Place.



W11 - Gabriel's Wharf

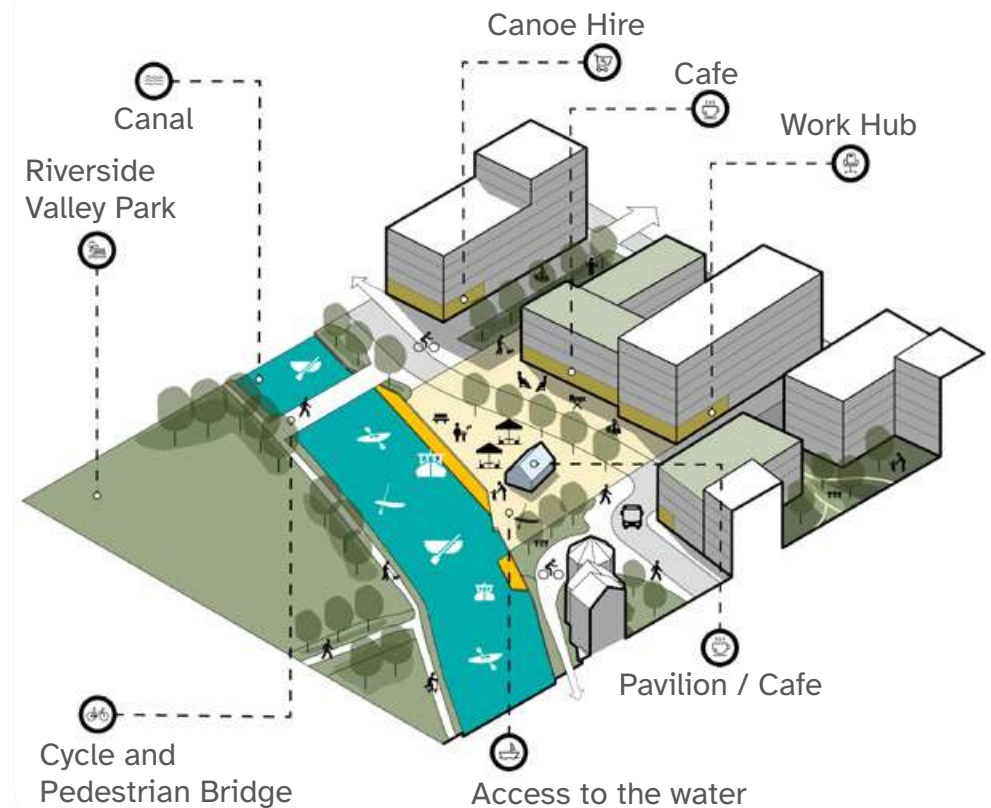
Garbriel's Wharf is an important point of connection between the Canal path, Water Lane, the existing railway underpass to Marsh Barton and potential future bridge across the Canal. A local node should be provided at Garbriel's Wharf, broadly as shown on the land use framework plan.

Development must ensure water access at the wharf is safeguarded. Opportunities for new improved access should be considered, including for canoes, kayaks and paddle boards. Refer also to W05 Water related uses.

A multi-functional public space should be provided behind the wharf fronting the Canal. Building frontages should be well set back from the wharf to reduce overshadowing of the space. A pavilion building of 1 to 2 storeys with active frontages may be suitable to be located within this space.

Development should include non-residential ground floor uses with active frontages facing the space. Suitable uses could include water related uses such as boat hire, in addition to local shops, cafés and work hub.

There are no specific development proposals for the existing homes at Gabriel's Wharf which are outside of the Code and Development Framework area.



Illustrative view of one development option for Gabriel's Wharf. Existing apartments at Gabriel's Wharf are retained.



Bristol Harbour Inlet Marina, Bristol

W12 - Clapperbrook Hub

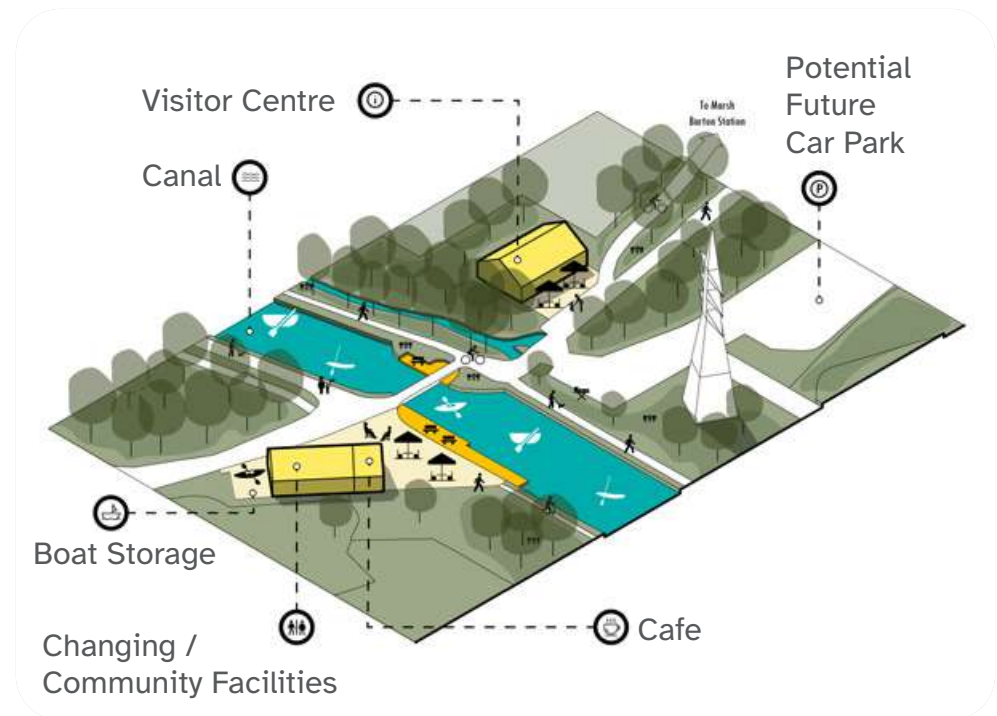
A local node should be provided by the Canal adjacent to Marsh Barton Station. This is a strategic gateway to the Riverside Valley Park with high connectivity for people walking, cycling and taking the train. There is an opportunity to provide a significant cultural attraction at Clapperbrook such as a regional wildlife centre, climate hub, outdoor activity centre or city-scale play space.

Other acceptable uses include boat and cycle hire, café, and replacement for the existing changing rooms. A new car park to the west of the Canal could replace the current Bromham's Farm car park which sits outside of the Development Framework and Design Code boundary. This would remove the need for cars to cross the narrow Canal bridge.

Limited development will be suitable in this location, buildings should be free standing structures of 1-2 storeys. Active frontages and spill out space for cafés and community uses should front on to Clapperbrook Lane and the Canal.

Reference should be made to the Riverside and Ludwell Valley Parks Masterplan.

Example of a local cafe within a park setting, Barking Park London. Image credit Robin Forster Photography.



Illustrative view of one development option for the Clapperbrook Hub.





4.6 Liveable buildings

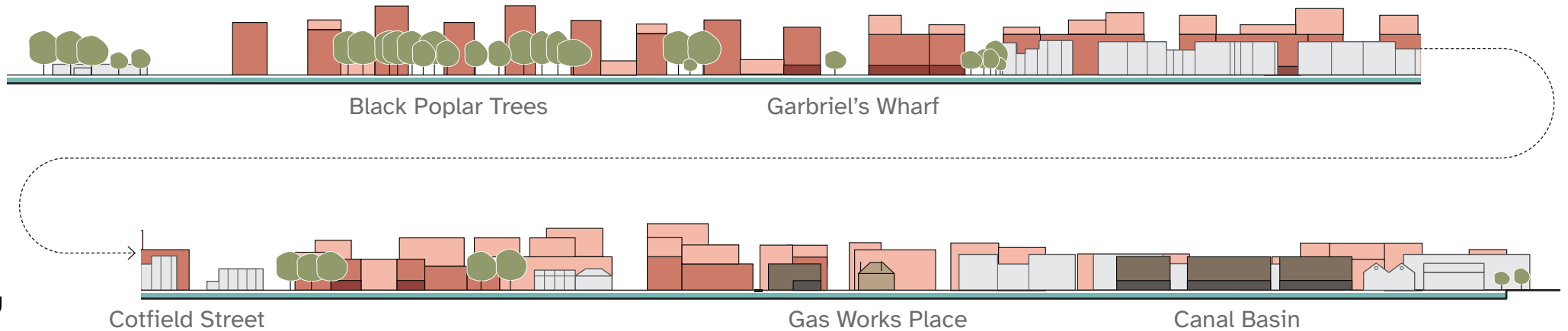
The City-wide ambition: Exeter's new and upgraded buildings contribute to an attractive city and are well-designed spaces where people enjoy spending time.

Responsive density and height

Page 357
Future Vision for Water Lane: Water Lane is an urban neighbourhood which makes the most of its location close to the city centre, canal and river. The area has a high density of buildings, yet they have a human scale and never feel overbearing thanks to the variation in height and location of taller buildings in the right places. Walking along the canal, you still catch the sun for large parts of the day and the varied buildings give the canal frontage an interesting character. Water Lane has retained a sense of light, space and nature thanks to gaps between the buildings and nature-rich streets with plants in abundance. What makes the streets truly unique are the creative design responses on the ground floor facades within the flood zone; climbing plants, decorative screens and entrances to small workshops and storage for kayaks help create pleasant and somewhat quirky streets to spend time in. The high quality continues inside the buildings with homes that are spacious, light and airy with a strong chance of spotting a kingfisher fly by.



Built form and scale



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Concept section viewed from the Canal illustrating an example of varied built form and scale providing glimpse views and light between buildings.

Overview

The Water Lane area is characterised by a variation in building form and scale, varied site conditions and a sense of light and space with glimpse views to surrounding areas.

Whilst the area will become more densely built up and include taller buildings, new development can build on the existing characteristics and provide a rich and varied built form; providing heights and densities which respond to the site context.

This section describes acceptable building heights, densities, massing and frontages and has been developed with reference to the Exeter Density Study (2021). The area has been divided into five built form zones to provide further specific detail.

Important aspects which will affect the acceptability of proposed height and massing include:

- The setting of the Riverside Valley Park and the Quay, and key identified views within section M05.
- Daylight, ventilation and outlook, for future residents and within public streets and spaces.
- The setting, daylight and amenity of existing residents.
- Existing site characteristics.

Building density

This section outlines a range of acceptable densities across different zones which have been developed with reference to the Exeter Density Study (2021). Density parameters must be used in combination with wider coding controls, and maximum densities may not always be achievable.

Dwellings per hectare

For residential development a density range of dwellings per hectare (dph) has been used. Site area is based on net site area (NSA). NSA includes infrastructure and services that are directly associated with the use of the developed buildings, including access roads, private garden space, open space and private car parking. It excludes major distributor roads, schools, public car parking, boat storage, significant utility infrastructure and public open space.

The density ranges are based on an average apartment size of 67 square meters gross internal area (GIA). For developments with a higher percentage of smaller units, including student housing and co-living, it may be possible to achieve a higher number of dwellings in total. These specialist housing types should be part of the mix and not dominate, refer to W06 Housing mix. Proposals above the maximum dph may be acceptable where it can be demonstrated that all other requirements of the Code are complied with, including dual aspect, variation in height and a mix of dwelling types. Similarly proposals below the minimum dph may be acceptable in certain situations, such as where significant non-residential uses or townhouses are proposed.

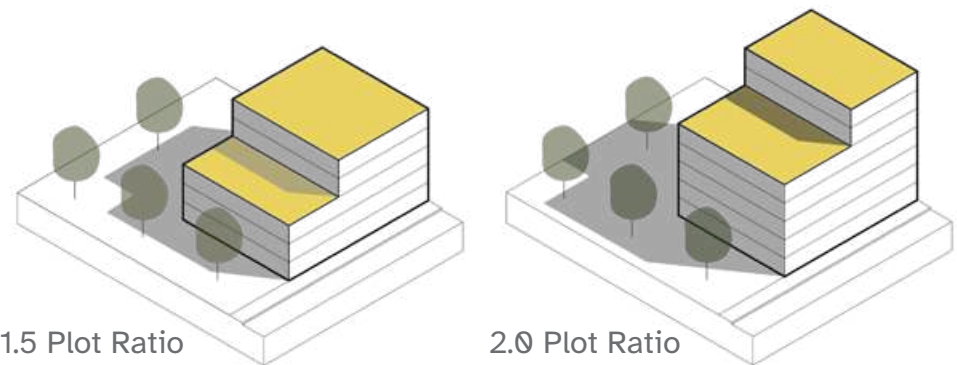
The Code sets out a preference for dwellings to be predominantly apartments, to ensure a suitable density, response to site constraints and other considerations. Townhouses will be suitable in certain locations where they help to address specific site conditions such as the presence of existing dwellings. The density ranges on the following page are set to reflect this.

High quality medium rise apartments with good provision of open space at Hammarby Sjostad, Sweden. This development has a density of 133 dwellings per hectare.



Plot Ratio

Maximum plot ratios have also been used, and are based on GIA. The plot ratio describes the maximum amount of acceptable internal floor space as a ratio of the site area. Proposals should comply with both dph and plot ratios. This ensures that proposals with more non-residential floor space cannot be significantly larger than purely residential developments. Site testing has been used to set appropriate maximum plot ratios. Proposals above the maximum plot ratio may be acceptable where there are non-residential ground floor podiums and it can be demonstrated that all other requirements of the Code are complied with.



1.5 Plot Ratio

2.0 Plot Ratio



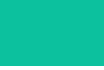

Plot ratio diagrams.

L01 - Building density

Proposals should align with the building density coding plan unless robust justification can be provided for an alternative arrangement.

The Central and Southern zone allow lower densities so that townhouses can form part of the mix of dwelling types. Townhouses should not dominate the development and should be located where they help respond to specific site conditions such as existing residential areas.

Legend

-  Northern canal zone
Residential density: 120-140 dwellings per hectare
Plot Ratio: up to 1.5
-  Canal basin zone
Residential density: 120-140 dwellings per hectare
Plot Ratio: up to 1.8
-  Central zone
Residential density: 75-180 dwellings per hectare
Plot Ratio: up to 1.9
-  Southern zone
Residential density: 75-220 dwellings per hectare
Plot Ratio: up to 2.2



Building density coding plan

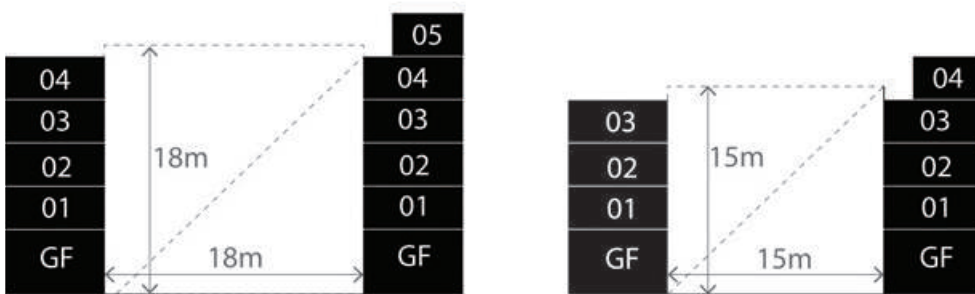
Building Heights

Maximum building heights and a site wide maximum street height to width ratio are set within this section. Additional detail on how maximum building heights should be applied is provided within the built form zone codes.

L02 - Street ratio

Building heights must be proportionate to the width of the street to ensure good daylight levels and that buildings aren't overbearing. Generally a street height to width ratio of up to 1:1 will be supported, but development can go beyond this in smaller sections e.g. with taller corner buildings. The top floor can be setback to enable an additional storey.

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Street sections illustrating a 1 to 1 building height to width ratio.



A height to width ratio of 1:1 results in good daylight access whilst still enclosing the street, Brentford Lock, London.

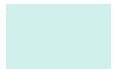



A high street height to width ratio, of more than 1:1, results in poor daylight access and privacy issues, Liverpool.


L03 - Building heights


Proposals should follow the building heights coding plan unless robust justification is provided for an alternative arrangement. Taller buildings, as defined within the legend below, must be of exceptional quality.


Legend


 Up to 4 storeys

 Up to 5 storeys

 Up to 6 storeys

 Occasional buildings of up to 5 storey may be acceptable within parcels. See 'northern canal zone' for details

 Occasional taller buildings up to 8 storeys, may be acceptable within parcels. See 'central zone' controls for details.

 Taller buildings of up to 9 storeys may be acceptable. See 'southern zone' for details.



Building heights coding plan

Built form zones

Built form requirements have been developed for five zones which respond to the character of the different areas.

Northern canal zone

The former Gas Works site is the most visible area of Water Lane. The canal frontage is seen as part of the cityscape when approaching from the south along national cycle route 34 and the adjacent footpath (view 1). The frontage is highly visible within the wider river valley view which opens up when approaching from the riverside footpath to the north (view 2). The site is also visible in long views from properties and streets on St Leonard's Ridge to the north east. The Haldon hills form a backdrop to this view. Key issues for this zone include impacts on the setting of the Riverside Valley Park and Quay, over shadowing of the Canal, and overbearing massing on the Canal footpath.

Canal Basin

The Canal Basin is a sensitive location adjacent to listed warehouses at 60 Haven Road. Key issues include responding to the historic context, overshadowing of the basin and the relationship to the established existing built form and scale.

Central zone

The central zone is setback from the Canal and river edges. Height and massing will have less impact on long views when compared to other zones but will still need to be carefully considered. Key issues include daylight and amenity for streets and homes within a denser and taller context. Taller development also has the potential to create an overbearing character if existing and proposed streets are too narrow.



View 1 View towards the northern canal zone, approaching from the south within the Riverside Valley Park.



View 2 View of the northern canal zone, approaching from the north within the context of the Riverside Valley Park.



View of Water Lane showing the relatively narrow existing street width and significant height difference behind the retaining wall to the north.



Glimpse views from the Canal of Haldon Hills between industrial units.

Central zone - Water Lane

Water Lane (the street) has a varied character, some street sections are particularly narrow, building setbacks are varied and there is a significant level change to the former Gas Works site to the north. Key issues include built form and massing responding to the varied site conditions and supporting the opportunity to create a high quality active travel focused street. Taller development has the potential to create an overbearing character and poor daylight access if the existing street width and level change are not considered.

Southern zone

The southern zone is a narrow area between the Canal and railway. It is further away from existing residential areas and has a leafy character. Large black poplar trees are a significant feature along the Canal edge. Long views of the site from the east are generally restricted by existing trees. The area around Gabriel's Wharf to the north of the zone has greater visibility from the Riverside Valley Park. There are glimpse views of Haldon Hills visible from the Canal footpath between the industrial sheds.






Key issues include impacts on the setting of the Riverside Valley Park, overshadowing of the Canal, and glimpse views between development from the Canal. There is the potential for good daylight, outlook and ventilation due to the narrow site depth. Combined with the restricted long views from the River Valley Park this could support taller heights within this zone.

Built form zones plan

The Water Lane area has been divided into five distinct built form zones, which reflect the different site characteristics of each area.

Additional detail is given on how maximum building heights described within L03 should be applied within the built form zones. Zone specific controls are also provided for massing and frontage. The built form zones align with the density control zones in L01.

Legend

-  Northern canal zone (L04+05)
-  Canal basin zone (L06+07)
-  Central zone (L08+09)
-  Central zone - Water Lane (L10+11)
-  Southern zone (L12+13)



Built form zones plan

Northern canal zone

L04 - Northern canal, height and massing

Built form must vary in height and have frequent gaps to avoid an overbearing continuous massing. Taller buildings must be slender and located in key locations, such as by a local node or on corners and away from existing dwellings.

L05 - Northern canal, frontage

All buildings must have active frontages with windows and frequent building entrances onto the Canal.

Buildings must be set back from the Canal to provide continuous public access and avoid over shading the Canal. The setback should be at least the same distance from the Canal edge as the height of the building.

Building lines should respond to the specific context such as being set back behind existing trees. This will help create a varied built form and Canal frontage.

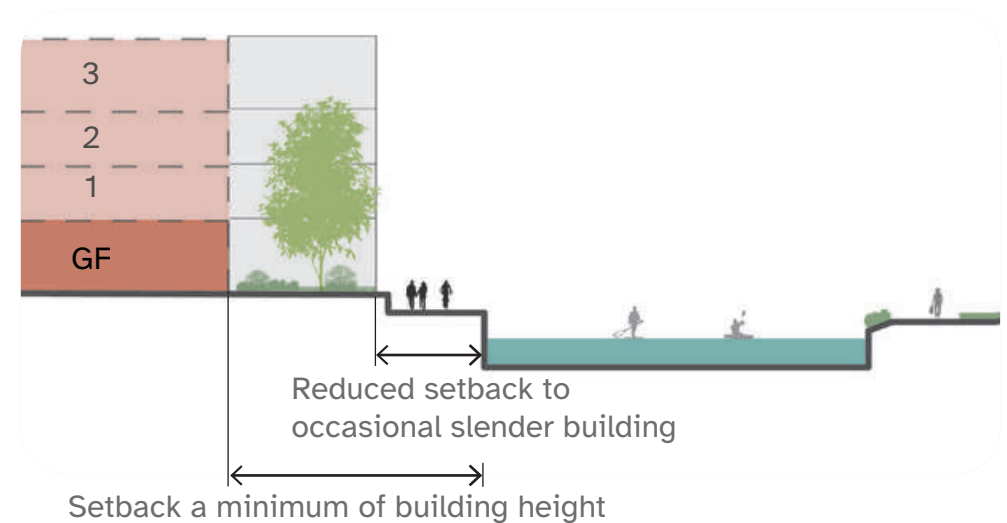
A reduced setback may be acceptable for occasional buildings which present a slender frontage to the Canal. Occasional buildings which cantilever over the public path may be acceptable if the building is of exceptional quality and in a suitable location.



Active frontages facing the water, Millbay Plymouth



Positive interface with the water, and well considered setback incorporating mature trees at Hammarby Sjostad, Sweden.



Illustrative canal frontage cross section

Northern canal zone

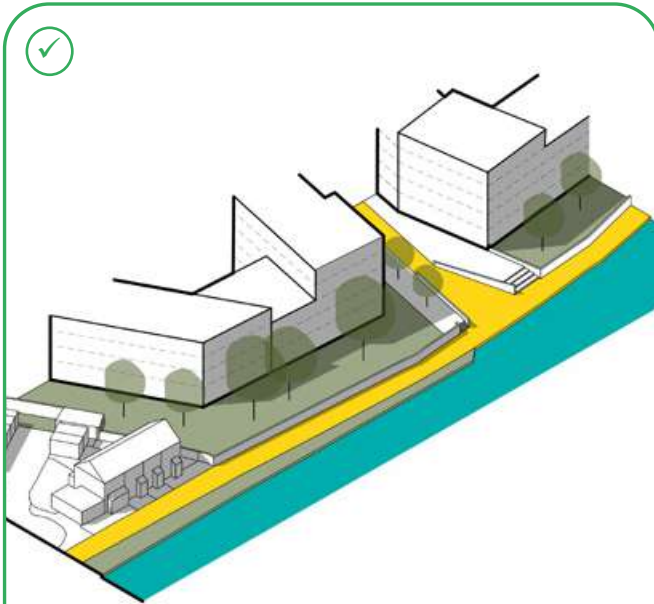


Illustration of an acceptable approach:

- Buildings of varied heights with gaps, well set back from the Canal behind existing trees.
- Occasional taller buildings are slender when viewed from the Canal. The example shows 30% of the canal frontage taller than 4 storeys.
- Development is well setback from existing houses.

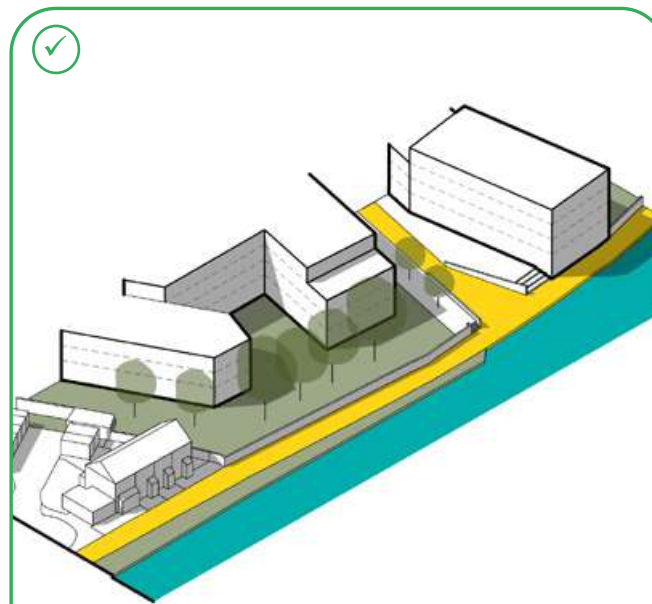


Illustration of an acceptable approach:

- An occasional slender building with reduced setback to the Canal.
- A 'u' shaped block creates gaps in the built form on the canal frontage and allows more homes to have water views.

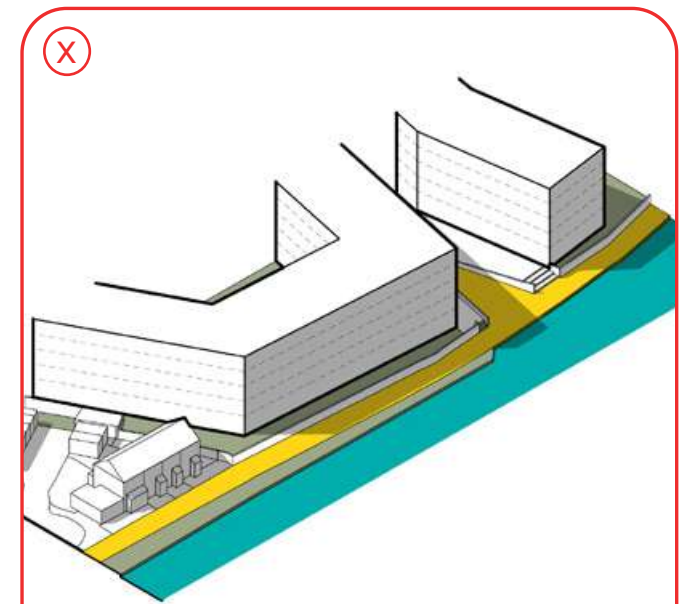


Illustration of an unacceptable approach:

- Continuous five storey massing.
- No retention of existing trees.
- 5 storey interface with existing terraced housing.

Canal basin zone

L06 - Canal basin, height and massing

Regular ground level gaps at a maximum of 50m spacing should be provided between buildings allowing glimpse views of the Canal Basin and regular pedestrian access from Haven Road.

The building roof form should be varied and relate to the historic warehouses on the basin. Building massing should be articulated to relate to the rhythm and proportion of the listed warehouses at 60 Haven road.

L07 - Canal basin, frontage

Buildings must be setback by a minimum of 3m from the basin and allow widened public access along the basin edge. Development can follow the building line of 60 Haven Road on the Haven Road frontage.

Developments should include glazed frontages and frequent building entrances fronting the Canal Basin. Frequent building entrances should be provided along Haven Road.

Windows on Haven Road must be designed to avoid overlooking of the existing housing on Haven Road.

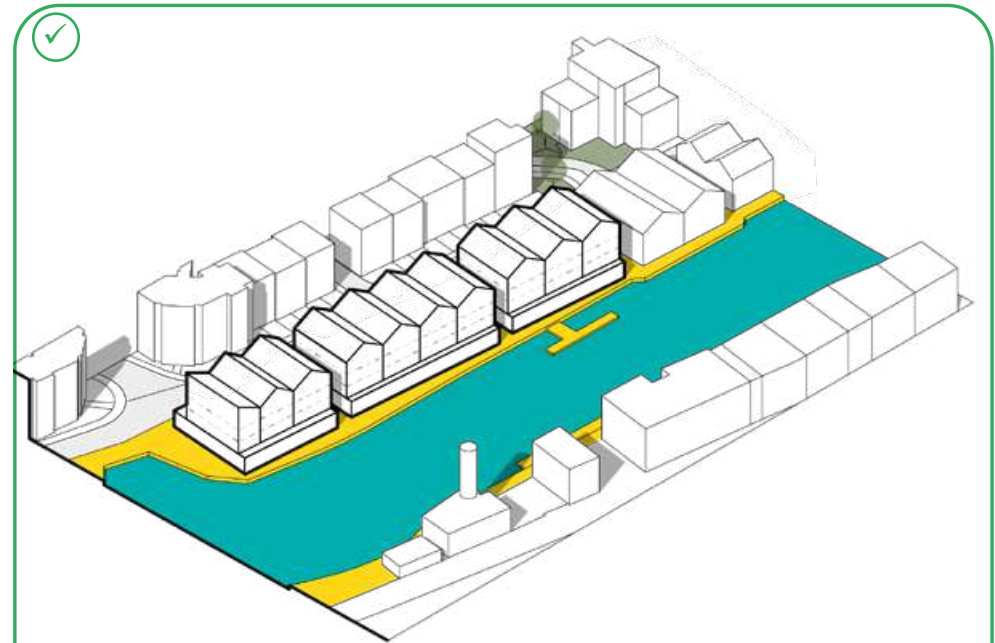


Illustration of an acceptable approach:

- Buildings are set back from the Canal Basin with gaps between blocks.
- An articulated massing responds to the adjacent warehouses.

Central zone

L08 - Central zone, height and massing

The central zone should be characterised by a perimeter block form of development. Proposals must have frequent gaps in blocks to avoid an overbearing continuous massing.

Built form must vary in height to provide light and variation to the street. Occasional taller massing must be slender and located in key locations, such as by a local node or on corner and away from existing dwellings. Continuous horizontal massing above 5 stories will generally not be acceptable.



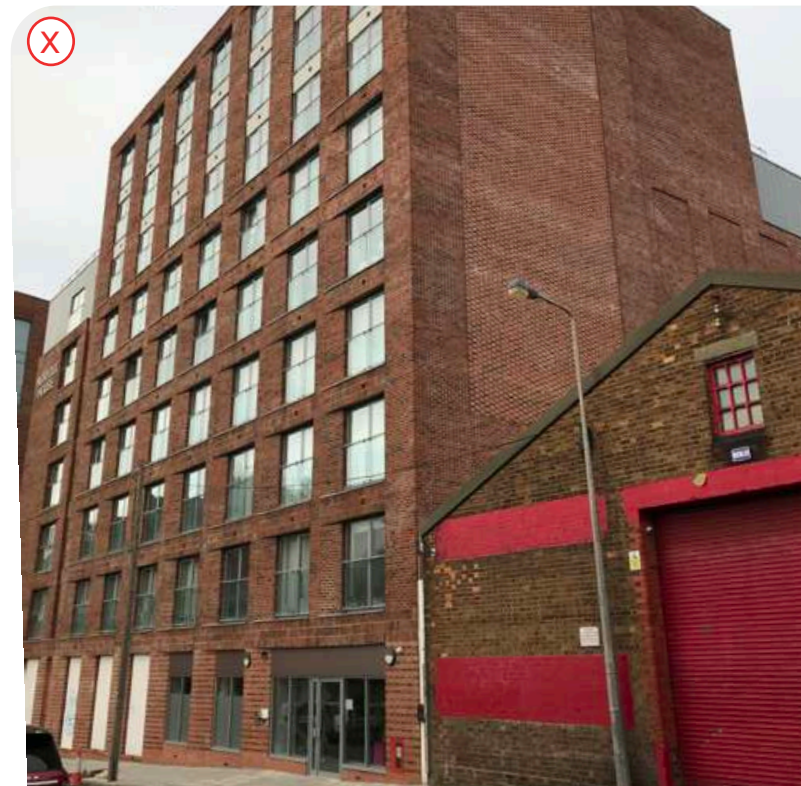
A well articulated street corner, with variation in height and form, Cambridge.

L09 - Central zone, frontages

All buildings should have active frontages with windows and frequent building entrances onto the street.

Buildings should generally provide a continuous building line to the street. Proposals must provide a shallow planting setback to 'green streets' and 'green lanes', refer to A21 and A22.

No variation in height and continuous massing over 5 storeys showing an unacceptable approach Liverpool.



Central zone

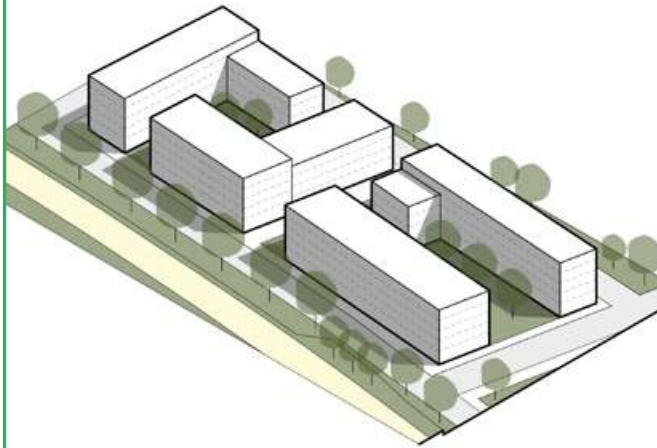


Illustration of an acceptable approach;

- Frequent gaps in blocks providing light and public access between buildings.
- A uniform building height up to five storeys.

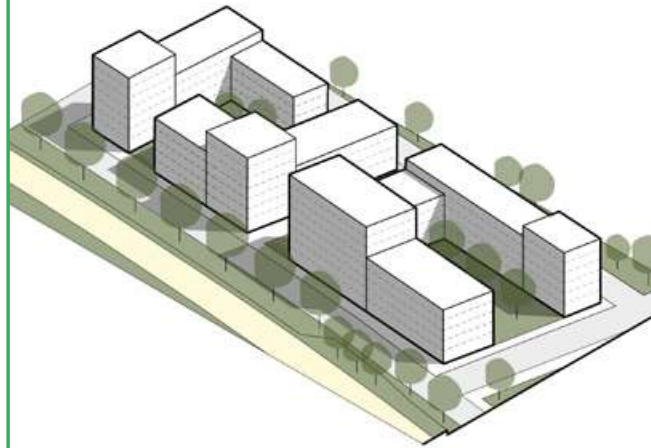


Illustration of an acceptable approach;

- Taller slender massing on corners and good variation in height.
- Taller buildings are occasional, the example shows 30% of the building footprint extending above 6 storeys.

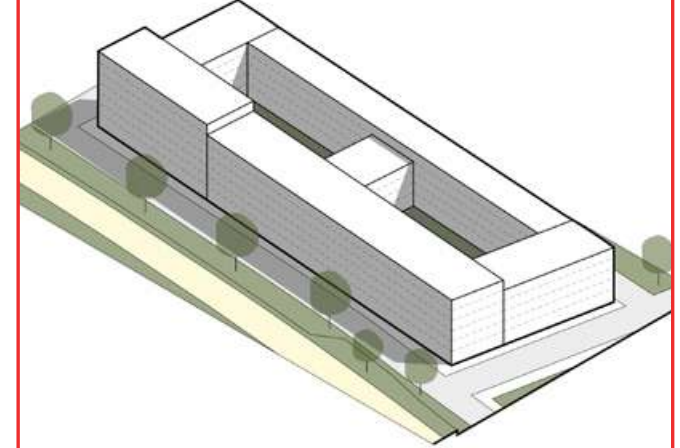


Illustration of an unacceptable approach;

- Continuous undivided blocks, and continuous massing above 5 stories can create an overbearing and uniform street scene.

Central zone - Water Lane (the street)

In addition to the general requirements for the central zone, proposals on Water Lane (the street) must consider the following. Refer also to the active streets chapter for further details.

L10 - Central zone, Water Lane frontages and building line

All buildings should have active frontages with windows and frequent building entrances onto Water Lane.

Building frontages must be setback along the south western edge of Water Lane to allow for street trees and avoid over shading of the street. The building line must allow a maximum 1:1 ratio between building height and street width.

Building frontages should vary to the north eastern edge of Water Lane. The building line should respond to the specific context such as being set back behind existing trees. This will create a varied built form and avoid an overbearing continuous massing. Occasional buildings which come forward to meet the existing stone wall or level change may be acceptable in specific locations.

L11 - Central zone, Water Lane height

Proposals must respond to the level difference between the two sides of Water Lane so that buildings on higher ground are not overbearing on the street. Appropriate responses include lower building heights, greater setbacks and setback upper storeys to ensure a maximum 1:1 street height to width ratio.

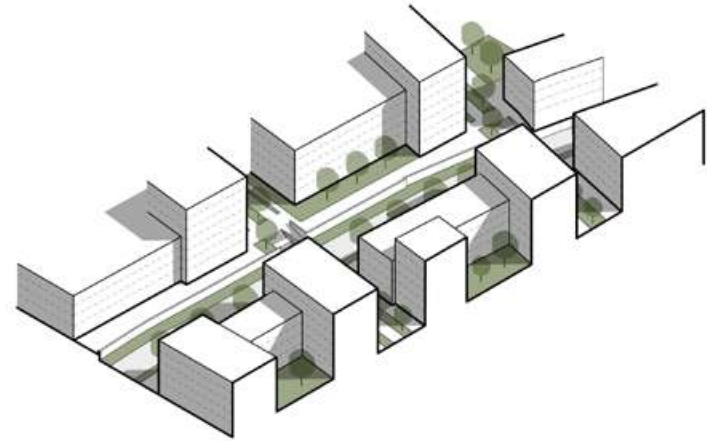


Illustration of an acceptable approach. Buildings are setback on the south western edge of Water Lane. Building frontages to the north east of Water Lane vary and are set behind existing trees.

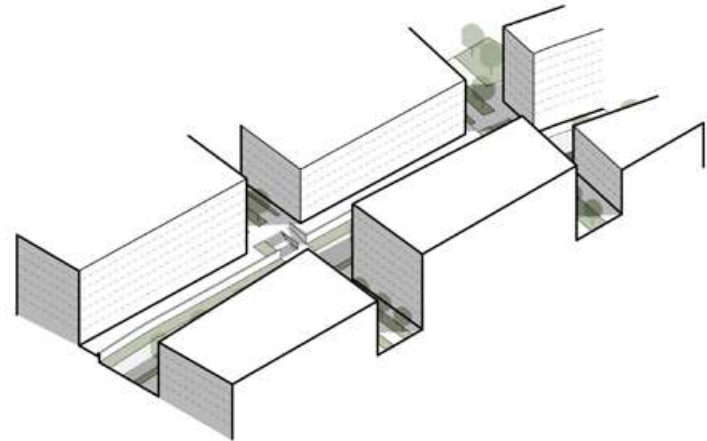


Illustration of an unacceptable approach. A continuous building line to the north east of Water Lane, continuous heights over 5 storeys and a street ratio greater than 1:1 create an overbearing appearance with poor daylighting.

Southern Zone

L12 - Southern zone, height and massing

Built form must vary in height and have frequent gaps to avoid an overbearing continuous massing and over shading of the Canal. Gaps between blocks should allow glimpse views from the Riverside Valley Park.

Taller buildings must be slender and located to create a varied skyline. Lower linking sections between blocks of up to 4 storeys may be acceptable where clear gaps are maintained.

A street height to width ratio above 1:1 may be acceptable on the streets running perpendicular to the Canal. These short streets can support good daylight levels and views out to the Canal. Refer to S13 for additional canal requirements.



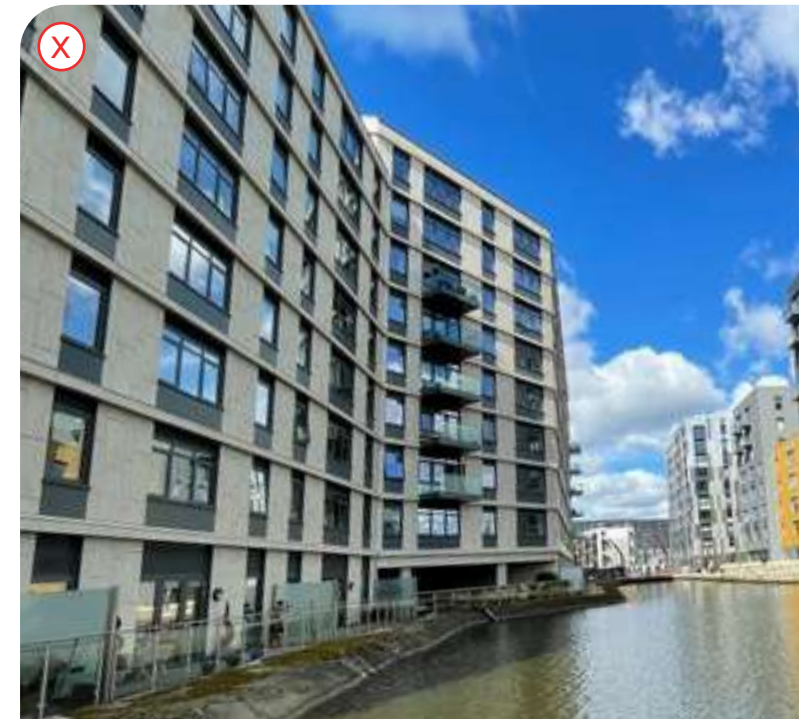
Slender blocks facing the water with gaps between buildings at Hammarby Sjostad, Sweden.

L13 - Southern zone, frontage

All buildings should have active frontages with windows and frequent entrances onto the Canal.

Buildings must be set back from the Canal to provide continuous public access and avoid over shading the Canal. Building lines should respond to the specific context such as being set back behind existing trees. Proposals must not create a continuous ground floor building line but should provide varied setbacks or gaps between blocks. This will help create a varied built form and Canal frontage.

Refer to S13 for additional canal requirements.



A continuous building frontage, and small setback creates an overbearing appearance to the water, Manchester.

Southern zone

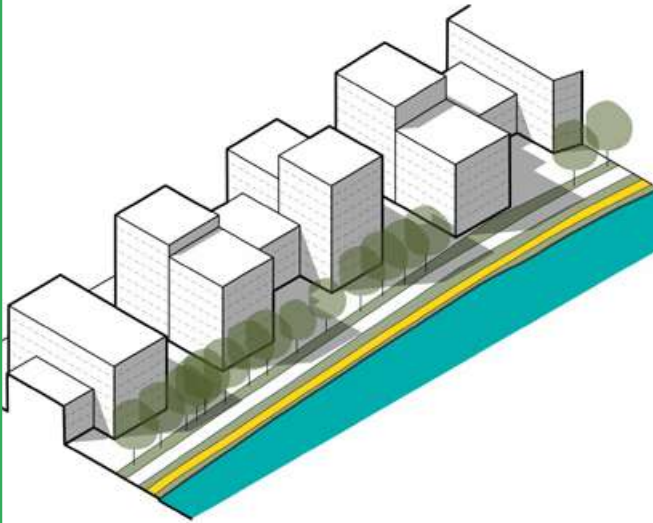


Illustration of an acceptable approach.

- Slender blocks are set back behind existing trees.
- Frequent gaps reduce the bulk and massing viewed from the Canal.
- Lower linking sections maintain glimpse views between blocks.

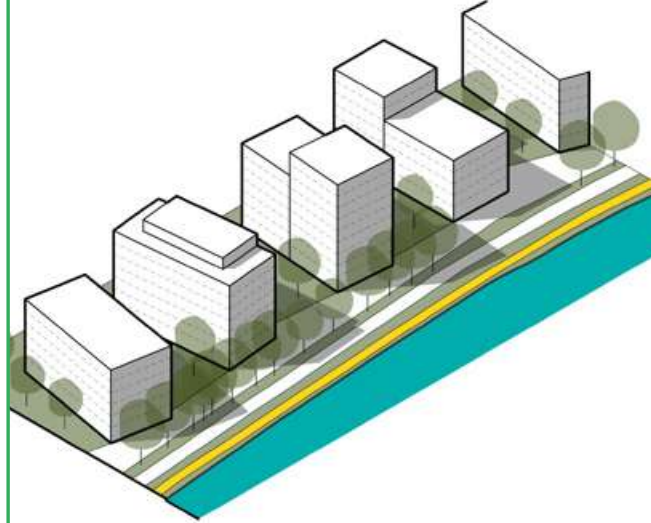


Illustration of an alternative acceptable approach.

- Individual slender taller buildings are set back behind existing trees.
- Frequent gaps between buildings, illustrated at 35m spacing.
- Non-continuous ground floor building line, illustrating 60% void in the canal building frontage line.

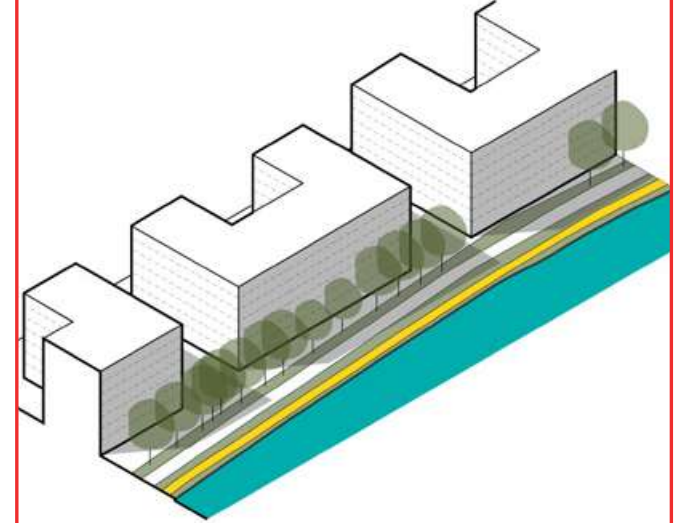


Illustration of an unacceptable approach.

- Continuous buildings block glimpse views from the Riverside Valley Park.
- Continuous taller buildings create an overbearing massing to the Canal frontage.

Site wide codes

The following section describes requirements which apply across the Water Lane area.

Residential amenity and housing types

Development should generally provide safe and healthy living conditions and a good standard of amenity for future occupiers, and avoid unacceptable impact on the amenity of neighbouring residents.

L14 - Housing space standards

Housing designs are encouraged to adopt the nationally described space standards.

L15 - Daylight

All homes should receive direct sunlight, combined with solar shading where necessary. As a minimum at least one habitable room should receive direct sunlight throughout the year.

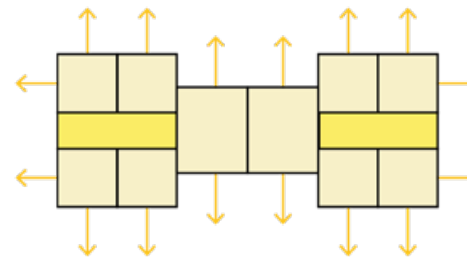
Communal areas in developments with smaller dwellings, such as student housing and co-living, should receive direct sunlight throughout the year.

L16 - Ventilation and dual aspect

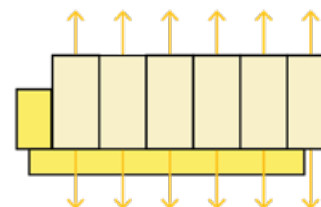
Homes must be predominantly dual aspect to achieve cross ventilation, varied outlook and access to sunlight through the day. Single aspect dwellings facing north or with 3 or more bedrooms will not be acceptable. Secure covered outside decks should be considered as a good option to allow a high percentage of dual aspect dwellings.

Single aspect units will be acceptable for smaller dwellings such as student housing and co-living. Communal areas in these development must be dual aspect.

Developments should avoid long narrow corridors and provide a maximum of 8 homes per stair and lift core.



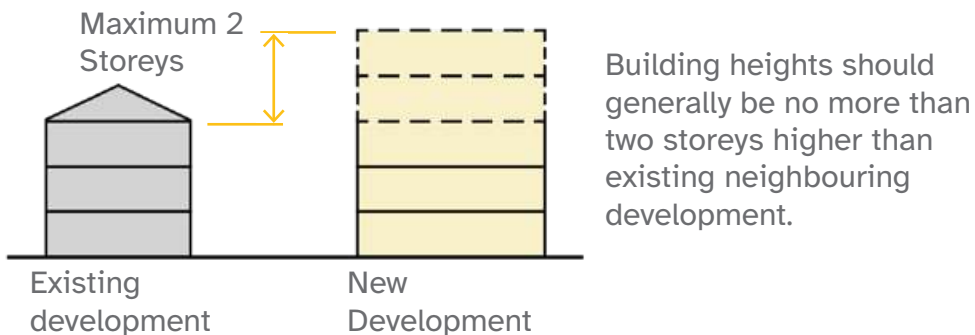
A dual aspect dwelling is one with opening windows on two external walls, which may be on opposite sides of a dwelling or on adjacent sides of a dwelling.



Deck accessed dwellings should be considered as a good option to allow a high percentage of dual aspect dwellings

L17 - Relationship with existing buildings

Proposals must respect the setting, daylight and amenity of existing residents. Distance between buildings and window locations should be well considered and agreed with ECC on a case by case basis. Building heights should generally be no more than two storeys higher than existing neighbouring development.



L18 - Noise

Proposals must demonstrate how acceptable noise levels are achieved within homes in line with best practice, whilst not compromising thermal comfort during warmer weather.

This can consider the location of habitable rooms, positioning of windows and doors, ventilation systems and where necessary sound attenuation measures. Key external noise emitters to consider include the railway, electricity substation, material reclamation facility and biogas plant among others.

L19 - Accessible homes

Residential developments are encouraged to accommodate changes in tenants' mobility, by designing housing to meet Building Regulations M4(2) accessible and adaptable dwellings standard.

Wheelchair accessible housing should be provided as part of a development housing mix to meet Building Regulations M4(3) wheelchair user dwelling standard.

L20 - Flexible homes

Proposals should demonstrate how homes are flexible to different residents needs, standards such as Lifetime Homes can be used to demonstrate this. Suitable space for a home office should be identified on plans. Bedrooms should be designed to accommodate multiple bed positions.

L21 - Storage

Proposals should explore opportunities to provide dedicated secure ground floor storage for apartments in addition to the required cycle storage. Storage should be suitable for bulky furniture and large sporting equipment including kayaks. Storage is a suitable ground floor use for areas of the site within flood zones 2 and 3.

Street frontages

Due to the flood risk within the Water Lane area, there may be streets where residential uses cannot be located on the ground floor. It is important that frontages and ground floors are well considered to provide active frontages, avoiding long sections of blank façades and inactive ground floors.

L22 - Raised ground floors

Within flood zones 2 and 3 it may be acceptable to raise the ground floor above the flood level to provide dry safe access. This applies where the level change is small, generally less than 1 meter, subject to detailed advice from the Environment Agency. Proposals should:

- Ensure they do not increase the flood risk outside the development.
- Carefully consider how the level changes are managed within the public realm to ensure step free access.
- Ensure frequent access point between levels.
- Use planting to avoid large areas of blank retaining walls.
- Incorporate street entrances to individual ground floor units to provide activation.
- Communal residential entrances should be frequent and prominent to activate the street, including large, well lit glazed lobbies with covered entrances.

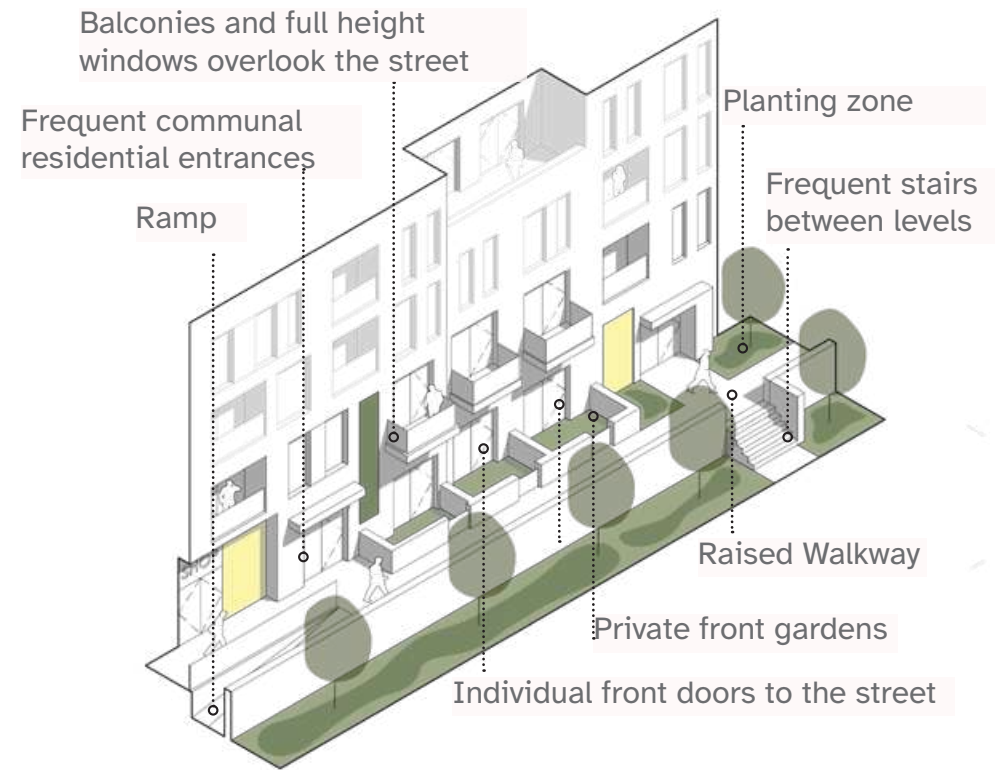


Illustration of an acceptable approach to a raised residential ground floor frontage outside the neighbourhood centre and local nodes.

L23 - Public, private thresholds

Proposed designs should clearly articulate the boundaries between public, communal and private space to ensure ownership and use is legible.

L24 - Non-residential ground floors

Where residential units are provided on the upper floors only, careful consideration of the ground floor frontage should be given:

- Glazed commercial frontages should be provided where possible, fronting on to key streets such as Water Lane, and the Neighbourhood Street.
- Communal residential entrances should be frequent and prominent to activate the street, including large, well lit glazed lobbies with covered entrances. Secondary access routes above the design flood levels may be required.
- Direct secure entrances to bike and kayak/canoe stores should be provided from the street to create activation.
- Balconies and full height windows should be used on the first floor to provide interaction with and visibility of the street.
- Blank frontages related to undercroft parking and storage must not be located on key streets such as the Neighbourhood Street or fronting the local green space.
- Where blank frontages are unavoidable they should be located on secondary streets such as green streets and green lanes, and should be kept to a minimum length.
- Creative approaches to the blank frontages should be used including planting in front of and up the wall, patterned screens and decorative façade designs.
- Where low vulnerability uses are located on the ground floor within the floodzone, they should incorporate resilience measures in line with best practice for all sources of flooding.

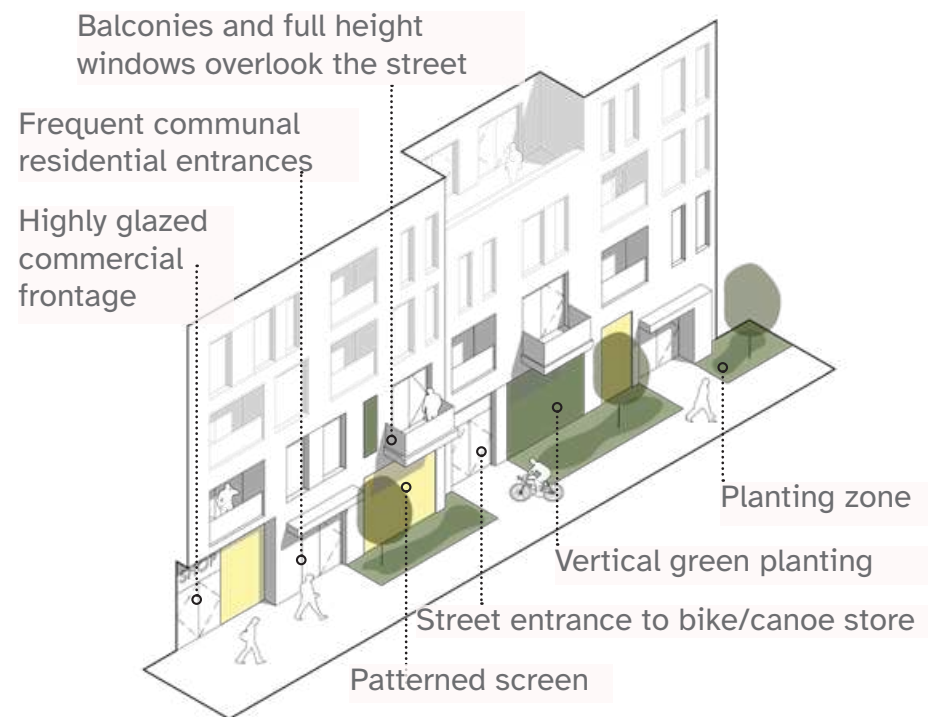


Illustration of an acceptable approach to non-residential ground floor frontages outside of the neighbourhood centre and local nodes.



An example of vertical planting used to screen the ground floor facade, Accordia, Cambridge.



Example of a decorative feature panel, Bristol



4.7 Active streets

The City wide ambition: Exeter has transformed into a city with high-quality streets where active travel, public transport and shared mobility are the natural and most convenient choice for most journeys.

Page 378 A low car and healthy neighbourhood

Future Vision for Water Lane: Water Lane is unique as Exeter's first, purpose built, low-car neighbourhood which has been a catalyst for the whole city to fundamentally re-imagine how people and goods move around. It's easy to move around on foot, by bike and by public transport within Water Lane and to get to the rest of the City, thanks to the significant street improvements, new connections and improved services the development helped deliver. With plenty of car clubs, people can drive when they need to and the delivery hubs mean vans don't need to drive all the way to people's front doors.

Most people coming from further afield arrive by public transport thanks to the two train stations, improved park and change services and new facilities for storing large water-sports equipment. The streets in Water Lane are social spaces where people, and a lot of wildlife, enjoy spending time. Instead of parked cars and road space, the streets are abundant in planting, with small play areas, planters to grow food and places to sit and enjoy the sunshine.



Movement and connectivity

Overarching opportunities and objectives

The mobility strategy for Water Lane has the potential to help address several aspects of the Water Lane Vision as well as addressing many of Exeter's city-wide challenges including the Net Zero 2030 target, congestion, pollution and inactive lifestyles.

Exeter's current mobility network prioritises vehicular traffic, historically seeking to minimise inconvenience to the car to the detriment of more sustainable modes. A transformational shift is required to increase movement capacity and achieve a positive step change in how people and goods move around the city. This is particularly relevant for Water Lane where Alphington Road, the main route to the area, is heavily congested for large parts of the day and options for further vehicle access points are limited.

Water Lane has a great starting point for being a low car area which prioritises active travel. There are several established and potential access points for active travel modes, providing more alternatives than for vehicles. However, many of these access points and connections are narrow and of varying quality, with investment needed to enable larger volumes of active travel. The connections into the City Centre are particularly constrained, whilst connections to Marsh Barton and across the River also need to be improved for the active travel network to reach its full potential.

In addition, St Thomas and Marsh Barton Railway Stations offer opportunities to be key transport interchanges for both future residents and those wishing to access the City. Active travel connections to these facilities need to be improved.



Generous footway, street trees, and low design speeds, Battersea, London.

The objective of a low car development at Water Lane can be supported through a low parking ratio, supported by access to car clubs, active travel infrastructure and public transport.

The key objectives for the mobility network are:

- Reduce congestion, air pollution and carbon emissions by shifting how people travel from private vehicles to cleaner modes that take up less space.
- Repurpose road space away from parked cars and vehicle traffic to more planting and trees, space for socialising, play, walking and cycling.
- Enable people to live more active lives by making active travel the natural choice for most journeys.

Within the Code requirements in this chapter the term 'Water Lane' refers to the street and not the wider area.

Mobility strategy

The mobility strategy for the Water Lane area is entirely led by the Vision to create a low car and healthy neighbourhood with streets for active travel as well as socialising and play. It re-imagines the roads, streets and paths as a mobility network which prioritises walking, cycling, public transport and shared mobility. These modes have greater capacity potential, help make streets less polluted, allow people to have more active lifestyles and help to reduce carbon emissions.



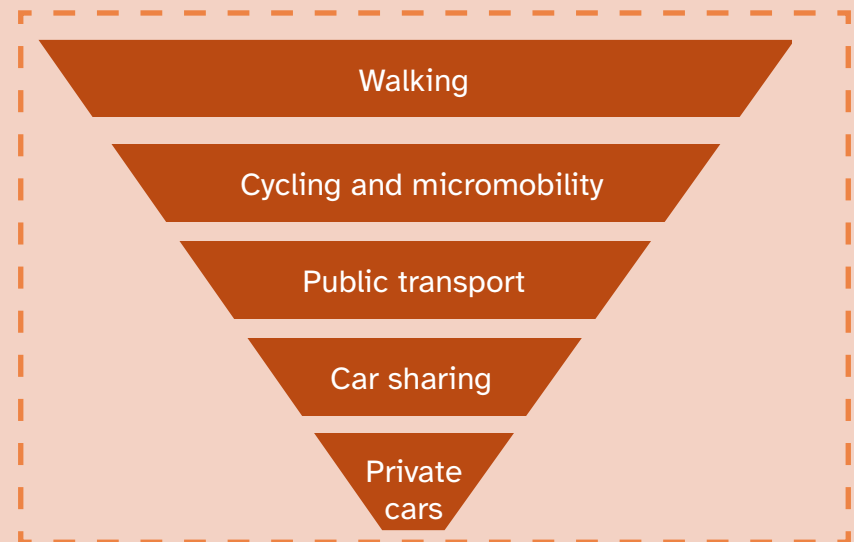
Shared active street with social spaces and play elements
Alfred Place, London

A01 – Mobility strategy

Development proposals should use a ‘Vision and Validate’ approach to the assessment of traffic impact and to inform their mobility strategy. This approach should be used to rebalance developer investment in highways infrastructure towards social, green and sustainable infrastructure supporting well designed places.

Development should adopt the following key principles to achieve the Water Lane area Vision:

- Maximise local living and minimise the need to travel by providing great digital connectivity and local facilities that satisfy day-to-day needs.
- Use the following priority hierarchy when planning the mobility network and when designing streets and junctions.




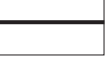








A02 – Mobility strategy plan




The mobility strategy plan sets out the street hierarchy and movement principles for the area. Proposals should follow the principles of the plan. Details of functions and design of streets are set out within A03, mobility coding plan.

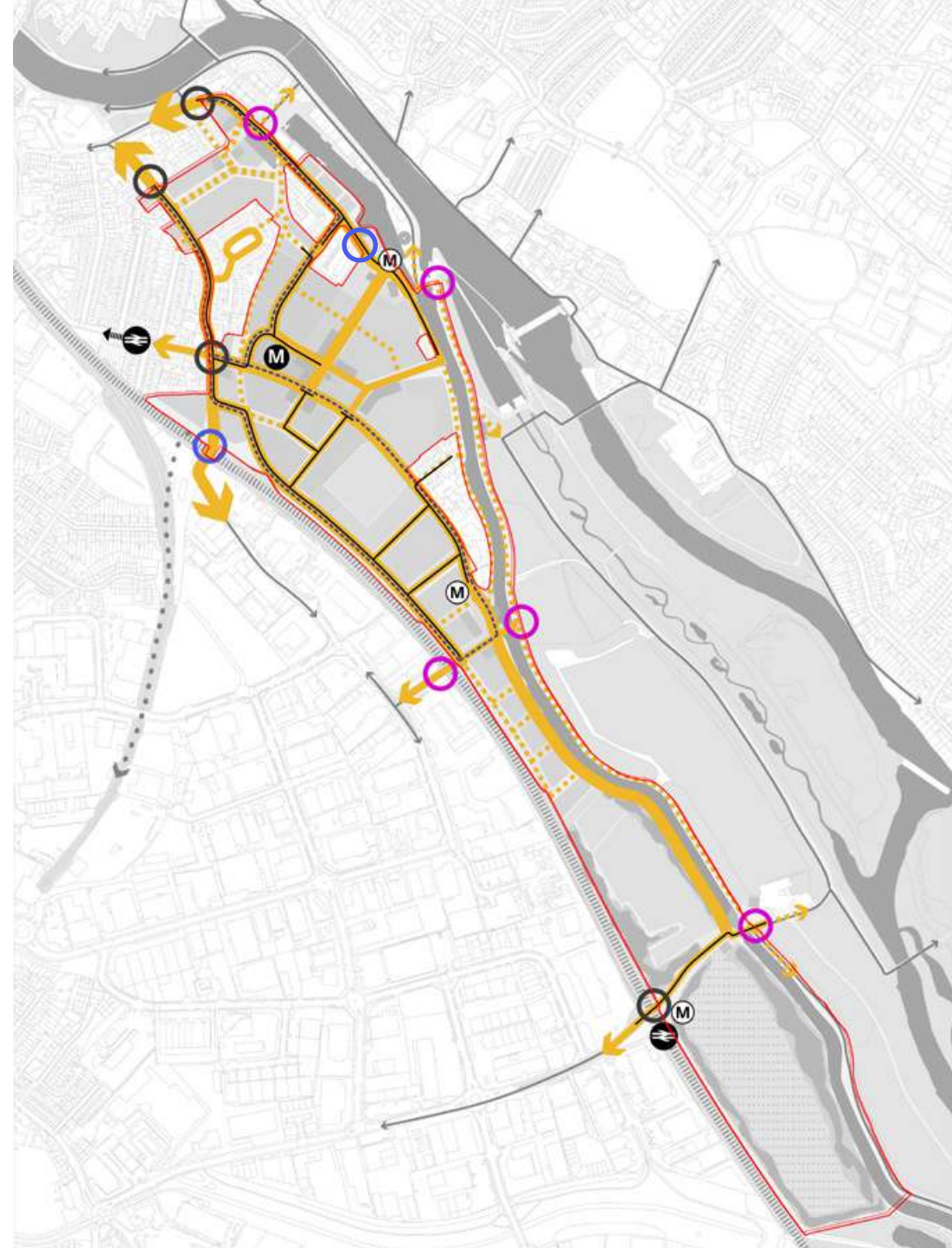
Legend

All streets prioritise walking and cycling

-  Primary street (fixed location)
-  Secondary street (indicative location)
-  Tertiary streets and paths (indicative location)
-  General vehicle access
-  Potential bus route
-  High Line (indicative route)
-  Key off site active travel routes/ desire lines
-  Train station
-  Mobility hub
-  Secondary Mobility hub

Access points

-  General vehicle, cycle and pedestrian access
-  Bus, cycle and pedestrian access
-  Cycle and pedestrian access



Mobility strategy plan

Site wide mobility codes

A03 - General requirements for design of streets and junctions

Streets and paths must be designed with priority for active travel and to be pleasant and safe for people walking and cycling. This includes clear sightlines, clean air, space for planting and seating and being well-overlooked by surrounding buildings with frequent windows and entrances. Streets should be designed to accommodate speeds no greater than 20mph.

Provision for active travel should be designed to accommodate future volumes and based on current national policy and best practice guidance. This includes Local Transport Note 1/20, Manual for Streets, Healthy Streets Approach and Inclusive Mobility.

Proposals must adopt an inclusive approach which considers the needs of vulnerable users from the outset, ensuring that everyone regardless of age and ability can easily get around. This involves providing protected road space where required and step free access where possible.

Cycling must be taken into account in the design of all new and improved streets and junctions. Junctions and crossings should enable cyclists to negotiate them in comfort without undue delay or deviation.

For lightly trafficked streets, the volume of traffic may allow cyclists to be integrated into the general carriageway, allowing additional space for wider placemaking improvements. Options for reducing carriageway width requirements should be taken. One-way routing may allow for further reallocation of road

spaces where this is limited.

Tight junction radii based on low traffic speeds and suitable speed reducing features should be used.

The development must have a permeable built form with an approximate maximum block length of 80 metres enabling good active travel connectivity across the site.

Proposals must include a wayfinding strategy including signage to key destinations such as train stations and the city centre.

The material palette, furniture and planting should be coordinated across the whole of Water Lane to ensure the public realm brings the development together. Materials and furniture should be robust and age and weather well.

Where streets are unadopted these must allow public access, and a robust management and maintenance strategy must be agreed.

Pedestrian and cycling priority pavement in Gdynia, Poland



A04 - Public transport

A bus service should be provided with a network of bus stops at 200-300m intervals. Opportunities for electric buses and demand responsive transport should be explored.

An indicative bus route is shown on the mobility strategy plan, however an alternative route can be identified if this provides a more suitable option. The bus route can use streets that are restricted for private vehicle traffic. High quality bus stops with shelters and attractive robust materials should be provided.

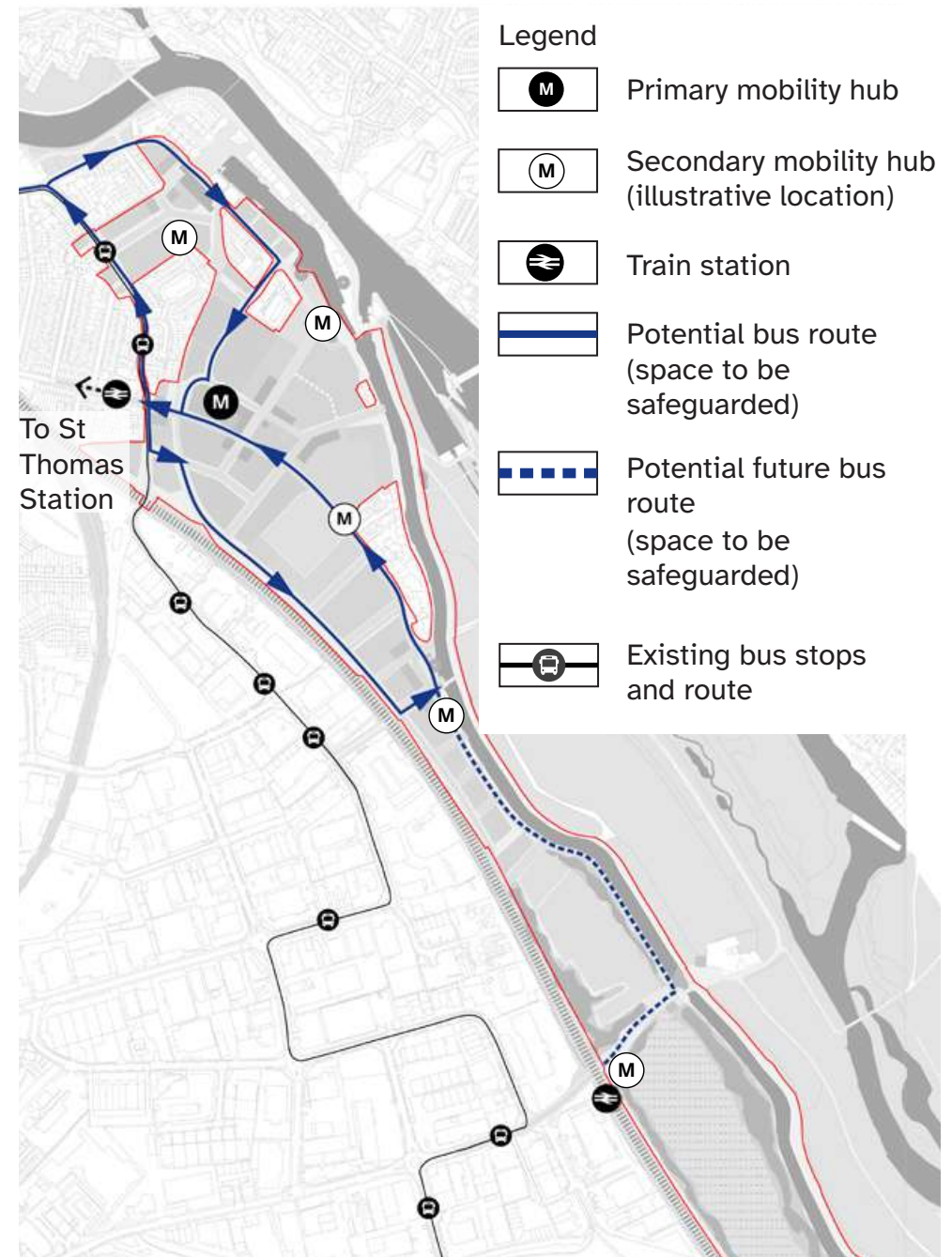
Proposals must create high-quality active travel connections to Marsh Barton and St Thomas train station and explore opportunities for a multi-modal interchange at Marsh Barton Station.

Allowance should be made to accommodate future public transport across Clapperbrook Bridge, noting that whilst upgrading this link may be unviable at present, land to accommodate improvements should be safeguarded.

Safeguarded routes

Safeguarded bus routes should incorporate suitable geometry to allow for the free flow of all modes throughout the site. Carriageway widths need not accommodate two-way bus movements along the entire length of the route, with priority sections allowing road widths to be minimised where required, facilitating a reordering of road space in favour of active modes and wider placemaking improvements. Bus routes should account for mixed use streets, allowing for buses and cycles/ scooters to safely and comfortably occupy the same road space.

Parking within these streets should not hinder bus operation.



Public transport plan

Mobility hubs

A05 – Primary mobility hub

A primary mobility hub should be provided in a prominent and easily accessible location within/adjacent to the Neighbourhood Centre as shown on the mobility strategy plan and land use plan. It should provide a choice of sustainable modes and make it easy to switch between modes. The mobility hub should be a multi-storey building making most efficient use of land. It should be designed to be adaptable to changing functions and demands as new services become more available.

The design of the mobility hub should prioritise facilities and parking for active travel over cars to facilitate sustainable travel. Vehicle access should be accommodated to the rear, away from the Neighbourhood Street. Active modes of transport and active uses such as bike hire, bike repair and parcel collection should be accessed from the front, onto the Neighbourhood Street, via a high-quality entrance/reception.

Features such as entrance/reception/shop front, cycle parking and parcel collection point should be accessed from the front onto the Neighbourhood Street.

The design of the mobility hub must conform to architectural requirements within the Liveable Buildings Chapter.

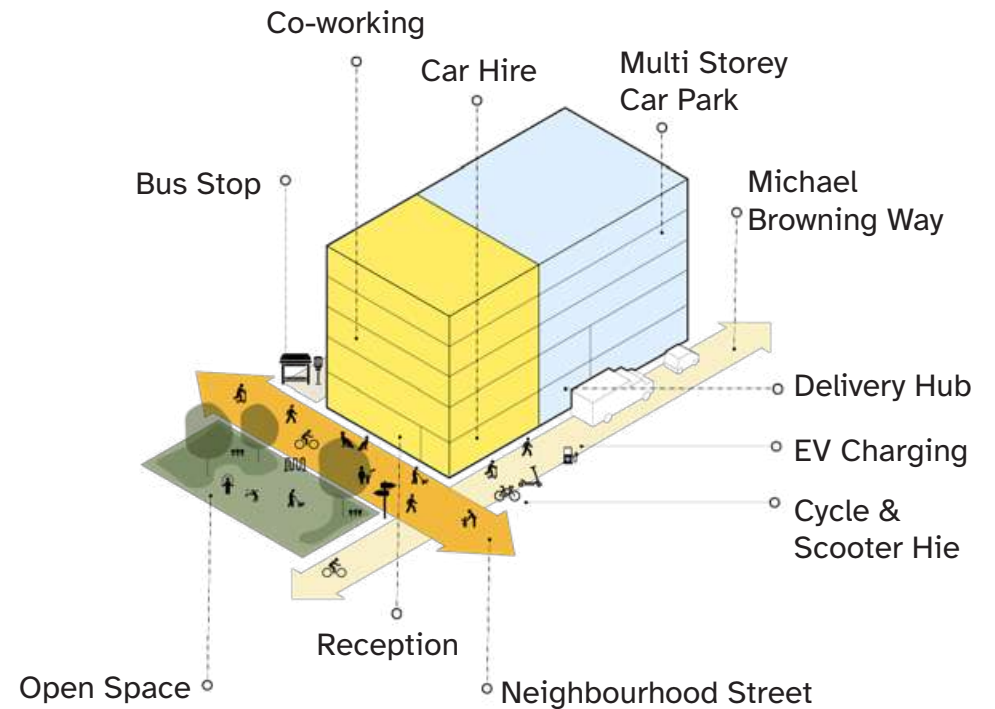
Illustration of the potential functions and arrangement of the primary mobility hub.



Active frontages provide good visual connections to ground floor public uses, Trafford Manchester.



Multi-storey car park with high quality facade and landscaping, Swindon.



A06 – Primary mobility hub functions

The primary mobility hub should include:

- A bus stop, or access to a bus stop within a short walk, with shelter and real time passenger information.
- Multi-storey car park with public car parking space replacing the existing Haven Banks car parks, consolidated parking for new residential development north of Water Lane and parking for the school. The ground floor ceiling heights need to be sufficient to allow vehicles with roof mounted bicycles and kayaks to enter.
- Car club spaces.
- EV charging.
- Secure cycle parking, including for cargo bikes.
- Cycle hire including for cargo bikes.
- Cycle repair.
- Electric cycle and electric scooter charging.
- Delivery hub with parcel collection.
- Access for delivery and servicing vehicles.
- Clear signage and transport information.
- Small café unless this is provided elsewhere in the neighbourhood centre.
- Potential for small commercial units.

A07 – Secondary and tertiary mobility hubs

Secondary and tertiary mobility hubs should be located across the neighbourhood providing access to car clubs, electric vehicle charging and bike hire near where people live and work. These can be combined with consolidated residential parking where suitable. The hubs should be:

- Easily accessible by foot.
- Visible to passers by to raise the profile and provide security.
- Located so as to be supported by a sufficient density of residents, business or through flow of passengers.
- Accessible for those with disabilities.
- Designed with consideration of safety issues, lighting and obstacles.

Cycle hub with attractive and secure cycle parking.
© Copyright 2018
Enfield Council



Parking

A08 - Car parking

Allocated car parking provision must be minimised and consolidated to keep most parts of Water Lane predominantly free from cars and ensure sustainable modes are the most attractive choice. Suitable parking quantum will vary across the site, with an indicative average of 1:5 parking to dwelling ratio.

Blue-badge spaces, space for servicing, car-club spaces and secondary mobility hubs can be provided within predominantly car free areas.

Proposals must include a site wide parking strategy which allows levels of parking to reduce over time and considers how parking areas can be re-purposed in the future.

Car parking should be provided within buildings, either as multistorey or as undercroft with other uses above. Undercroft parking should avoid blank street frontages, refer to L24. Surface car parks will generally not be accepted unless they serve a specific purpose such as drop-off parking for water-related activities.

Minimising and consolidating car parking should be used as a tool to enable higher densities whilst ensuring good levels of open space and high quality streets with planting, seating and play that are pleasant for people walking, cycling and socialising.

Proposals should explore opportunities to provide car parking and car clubs for existing residential areas where this can help to free up space in the street for public realm improvements.



Convenient and secure visitor and resident cycle parking, Cambridge

A09 - Cycle and mobility parking

Cycle parking must be provided in line with current government best practice guidance, with the requirements of all types of cycles and users considered.

Secure enclosed cycle and mobility aid parking for residents and visitors must be provided in convenient locations near the front door, and prioritised over car parking. Parking should accommodate electric cycles, cargo bikes, and mobility scooters.

The quantum of cycle parking must be considered at an early stage and should reflect the needs of residents and visitors. As a low car neighbourhood, the need is likely to be higher than minimum standards, potentially one space per resident.

Suitable levels of parking should be provided at interchanges with other modes, short stay destinations such as the Neighbourhood Centre and long stay destinations such as workplaces and the school.

Proposals should explore opportunities to provide secure cycle parking for existing residential areas, for example communal street bicycle lockers.

Strategic flood access and egress

This section outlines potential flood access and egress options and describes acceptable solutions from a placemaking perspective. The detailed and final solution will be determined through an area wide strategy for Water Lane and Marsh Barton and the planning application process, with close collaboration between applicants and relevant authorities.

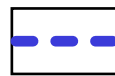
The schematic plan showing strategic safe access and egress options is indicative. There are several challenges with providing a strategic flood route including, resolving levels, bridging streets, long term stewardship, safety and coordination between land ownerships. The Code does not propose specific solutions for these issues. Instead it outlines key design considerations for different strategies to form the basis for discussion between applicants and the relevant authorities.

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Legend



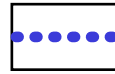
Foundry Lane



Former railway egress route option.



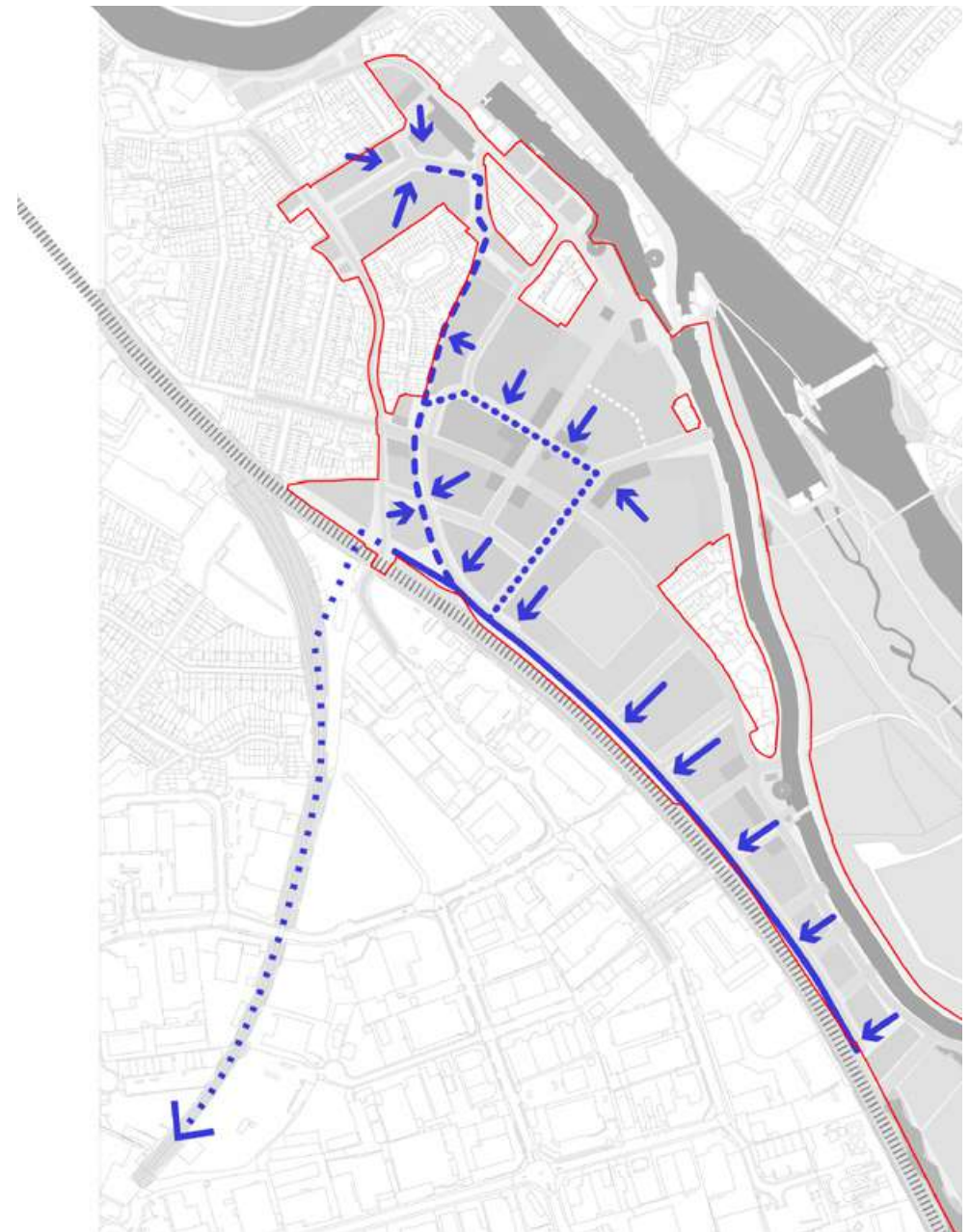
Potential future 'High Line' route with pedestrian cycle bridge across active railway.



Route options to former Gas Works site north of Water Lane.



Illustrative connections from surrounding development to the route.



Indicative strategic safe access and egress route options. Routes to be confirmed by the emergency planning authorities.

A10 - Safe access and egress

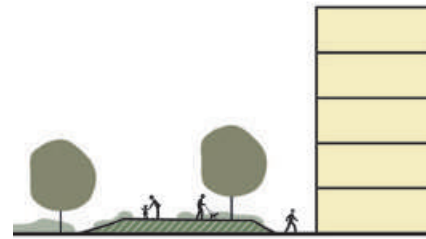
Development proposals must plan safe flood access and egress early in the design process to ensure it is well incorporated and meets the requirements of the relevant authorities. Proposals must be aligned with and support the safe access and egress strategy for the wider Water Lane/Marsh Barton area.

The strategic safe access and egress route must be designed to provide access and egress during times of flood, including the impacts of climate change on water depth, speed and direction of flow, as modelled by the Environment Agency. All plots and premises must have access to the strategic safe access and egress route. Development proposals must provide a safe, dry route above design flood level to connect into the strategic route.

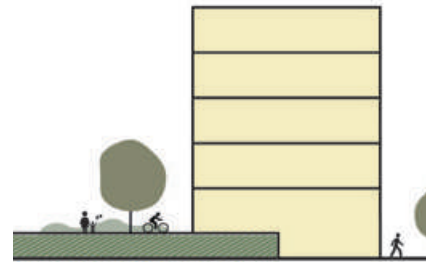
The strategic safe access and egress route should provide an attractive and direct active travel route outside times of flooding. The route must be well-designed, safe, publicly accessible to all, at all times, well signposted, and support good placemaking in accordance with best practice. It may also be necessary to include a place of refuge above predicted flood levels.

Depending on the final option, the access and egress route should provide attractive open space and public realm in its own right. Design and appearance must be carefully considered against all the requirements of the Code. Stewardship and maintenance of the route must be considered from the outset.

Detailed proposals should be agreed in collaboration with relevant authorities. The following headings describe multiple ways to achieve a well-designed route.



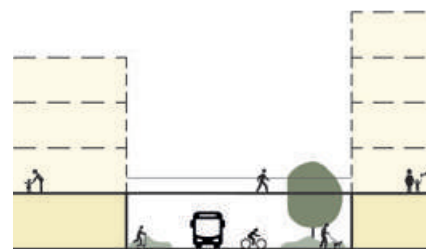
Banked Street or Path. A locally ramped section of street may be suitable where levels are to be raised by up to 2m. Designs should ensure frequent access points and good visibility between levels, and avoid creating voids and areas which are not well overlooked.



Raised Development. Where a whole street is raised, consideration should be given to raising the adjacent building plots to ensure a good relationship between building and street and avoid long lengths of buildings below street level.



Building podium. Where levels need to be raised above 3m then consideration should be given to incorporating the route within building design. Proposals must consider security, stewardship and ensure public access at all times.



Bridges between buildings may be required where the route needs to cross streets at a high level. This approach needs careful consideration of security, stewardship and must ensure public access at all times. Designs should also consider the highway requirements and design of any streets to be crossed.

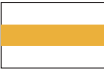












Strategies for achieving a raised flood egress route

Street codes

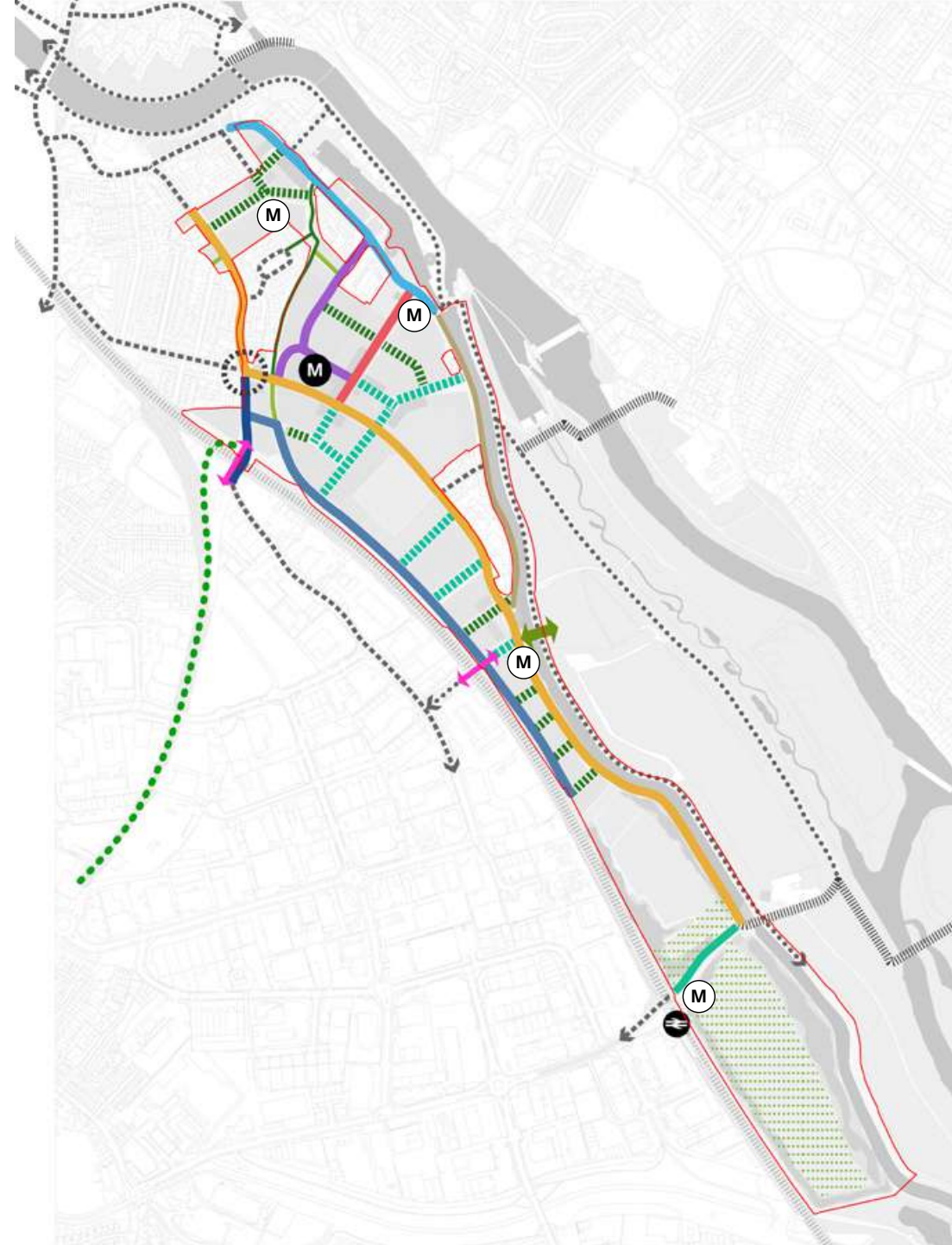
A11 – Mobility coding plan

Development proposals should follow the mobility coding plan. Details of functions and design of streets are set out in the 'Street Codes' section.

Legend

	Water Lane A12-14, Fixed location		Clapperbrook lane Fixed location
	Neighbourhood Street A15, Fixed location		New canal bridge A23, Indicative location
	Foundry Lane A17, Fixed location		Railway underpass A25
	Haven Road A16, Fixed location		Off site streets/ roads A26
	Michael Browning Way A19, Fixed location		Off site paths A26
	Tan Lane A18, Fixed location		River Bridges A26
	Green Streets A21, Indicative location		Primary mobility hub A05 , A06
	Green Lanes A22, Indicative location		Secondary mobility hub A07, Indicative location
	Canal path A24, Fixed location		Train Station
	New path Fixed location		Northern site access A20
			Exeter High Line

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Mobility coding plan

A12 – Water Lane, role and function

Water Lane should function as the main active travel route through the neighbourhood, connecting Haven Banks with Marsh Barton Station.

The design of the street should vary along its length responding to site conditions and the role and function of each section as shown on the mobility coding plan.

The design of Water Lane should set a new high-quality benchmark for active travel priority streets in Exeter.

Space should be safeguarded to accommodate a bus route, emergency vehicles, servicing and utilities along the full length of Water Lane. Typical carriageway widths are provided within the street sections, refer to A14. Carriageway widths do not need to accommodate two-way bus movements along the entire length of the route, priority sections can be used where space is limited. The street should be designed to allow occasional heavy goods vehicles to access the solar farm and bio gas plant.

Development on the southern side of Water Lane must be set back to allow the street to be widened to accommodate more generous footways and space for planting and seating.

Water Lane is an important flood flow route, and its capacity must not be reduced e.g. through built form and raising carriageway levels. Trees, planting and seating are acceptable and will be encouraged within widened setbacks.



Buildings are set back behind street trees and benches. London



A direct active travel route through the centre of the neighbourhood.



Shared carriageway, with low design speeds and traffic volume, suitable for cycling and wheeling, Battersea, London.

A13 – Water Lane, managing level change

A minimum of two active travel connections should be accommodated from street level to the upper-level north of Water Lane, however more are encouraged. The main two access points should be to the mobility hub and to the Neighbourhood Street.

The access should be generous and well-designed providing an attractive public realm. The connection to the Neighbourhood Street must be accessible for all users. Where other connections need to be stepped, these should include wheeling ramps for people with bikes and buggies.

The connection from Water Lane up to the neighbourhood centre should be wide and well-designed, providing an attractive public realm. It should be step free if possible or accommodate ramps for people with bikes, buggies and wheelchairs.

Proposals that take an innovative approach to dealing with the level change through well-designed steps, ramped public realm, design improvements to the existing stone wall and buildings that interact with the wall are encouraged. Poorly designed, narrow and steep sets of steps will not be acceptable.



South Park View steps, Queen Elizabeth Olympic Park, London



Accessible level changes, Union Terrace Gardens, Aberdeen

A14 – Water Lane, access and movement

Zone 1

This zone accommodates general traffic accessing the mobility hub and sites north of Water lane via Michael Browning Way. A segregated cycle way should be provided within this zone.

Zone 2

This zone should be free from general traffic and not provide access to parking, (except for blue badge parking where required). Well-designed bus gates can be used to restrict access. The southern section of zone 2 provides an important active travel connection to Marsh Barton Station, walking and cycling should be prioritised.

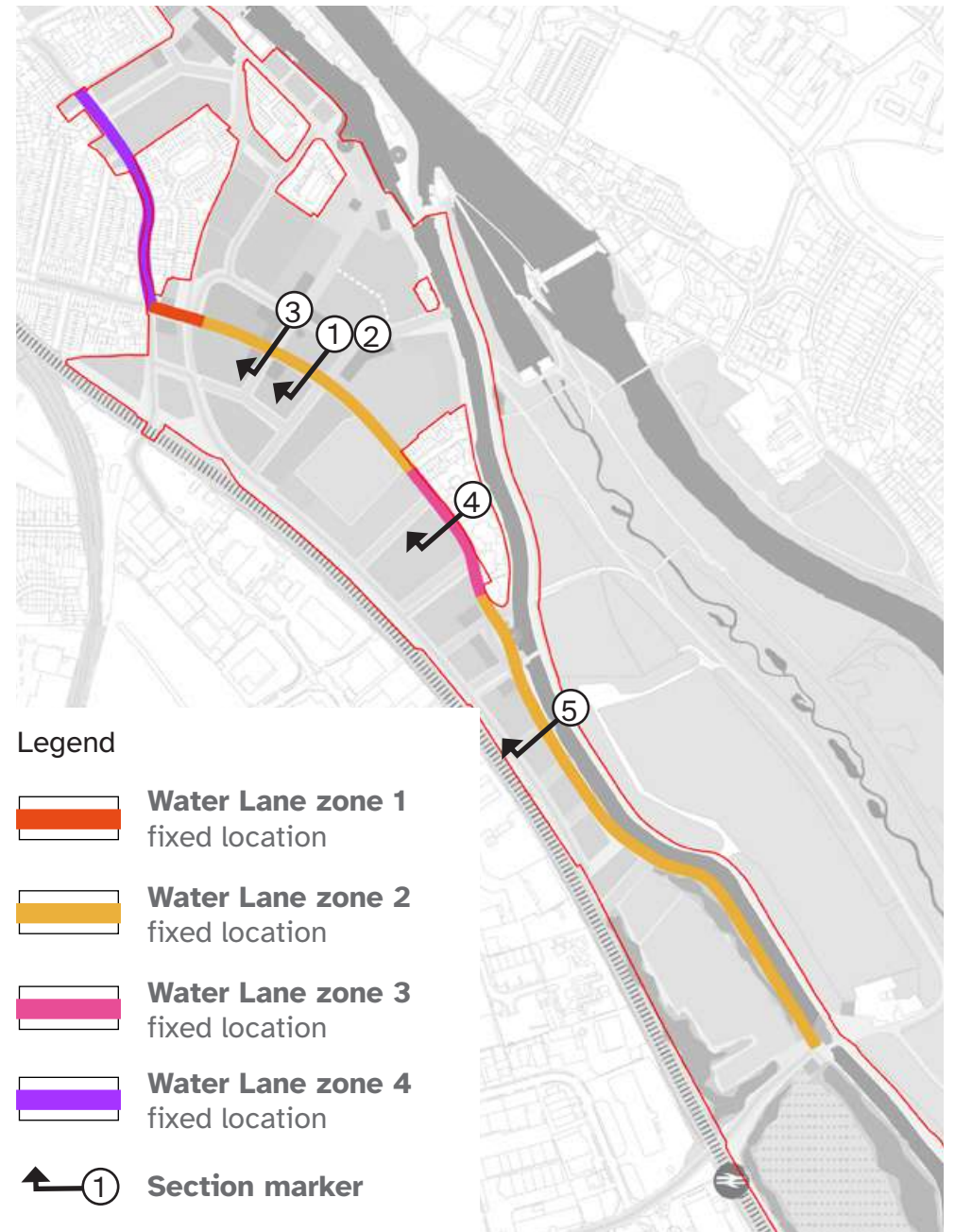
Zone 3

This zone can accommodate limited general traffic and access to existing residential areas at Cotfield Street and Gabriel's Wharf. Opportunities to consolidate existing on street parking within adjacent development should be explored.

Zone 4

This zone should explore opportunities for improving active travel such as a segregated cycleway connecting to Alphington Road via Haven Road.

To the south this section of Water Lane turns into Tan Lane. It is an important public transport route and will become a key active travel link between Marsh Barton and the city. Refer to A18 for Tan Lane requirements.

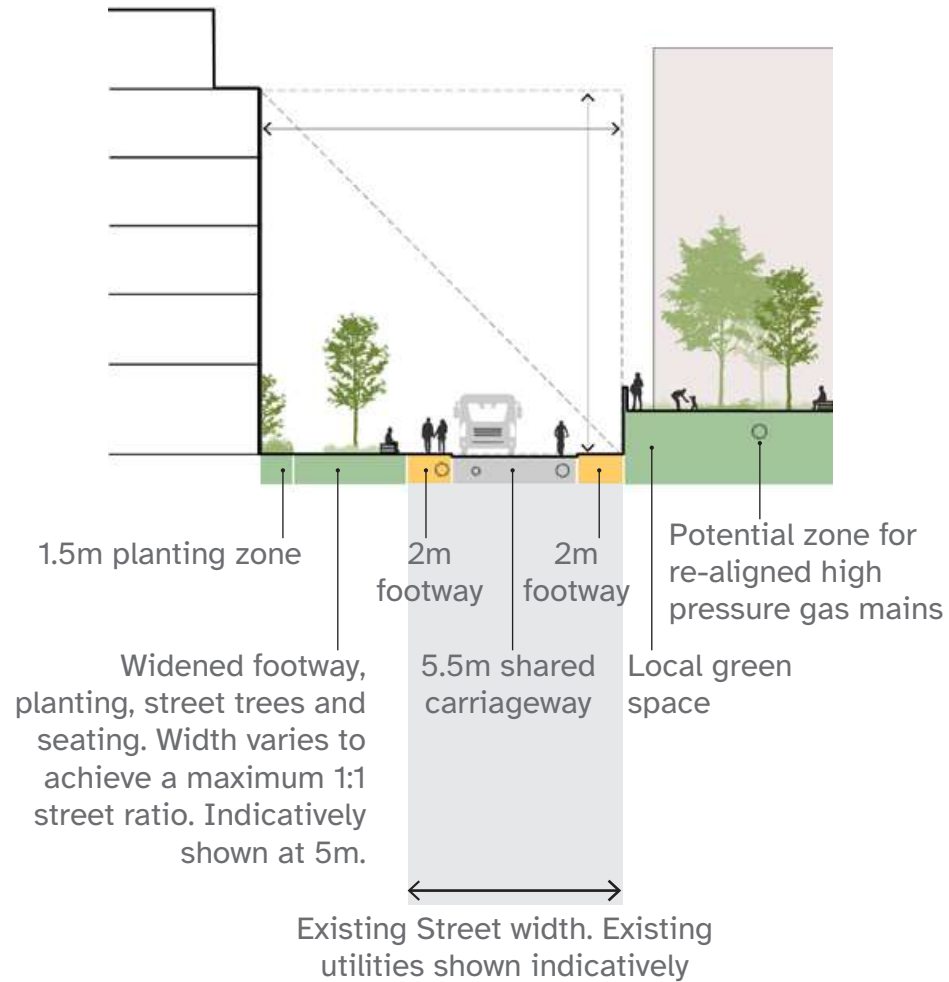


Water Lane access zones and section key plan

Street section numbering corresponds with the section plan on the previous page.

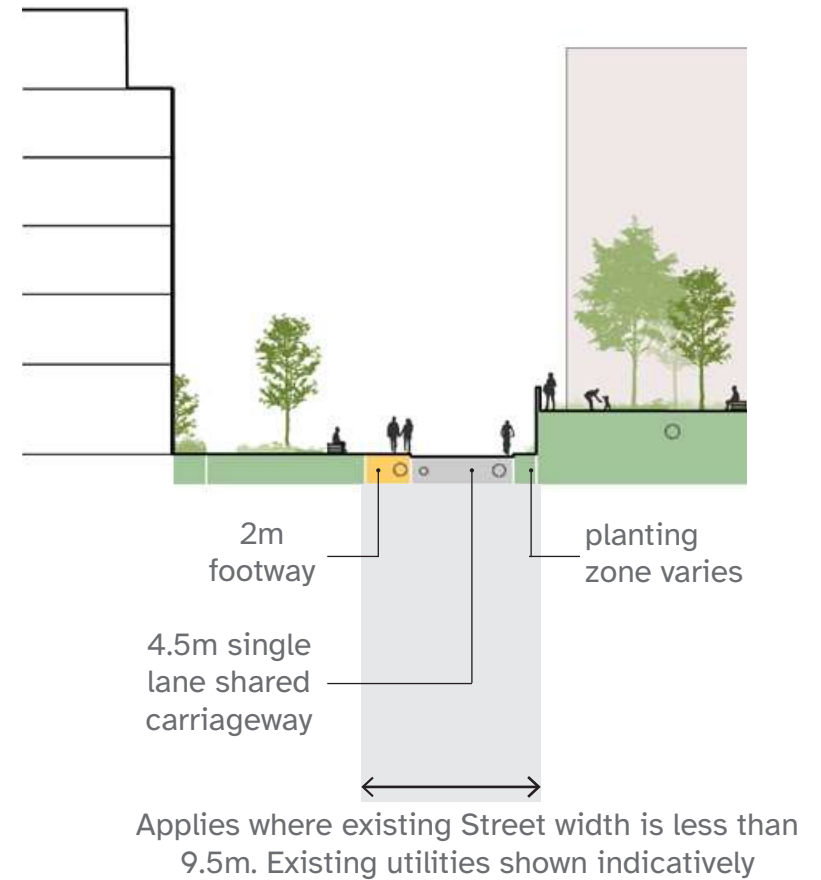
Water Lane Section 1: Typical section

Illustration of one acceptable option



Water Lane Section 2: Reduced width

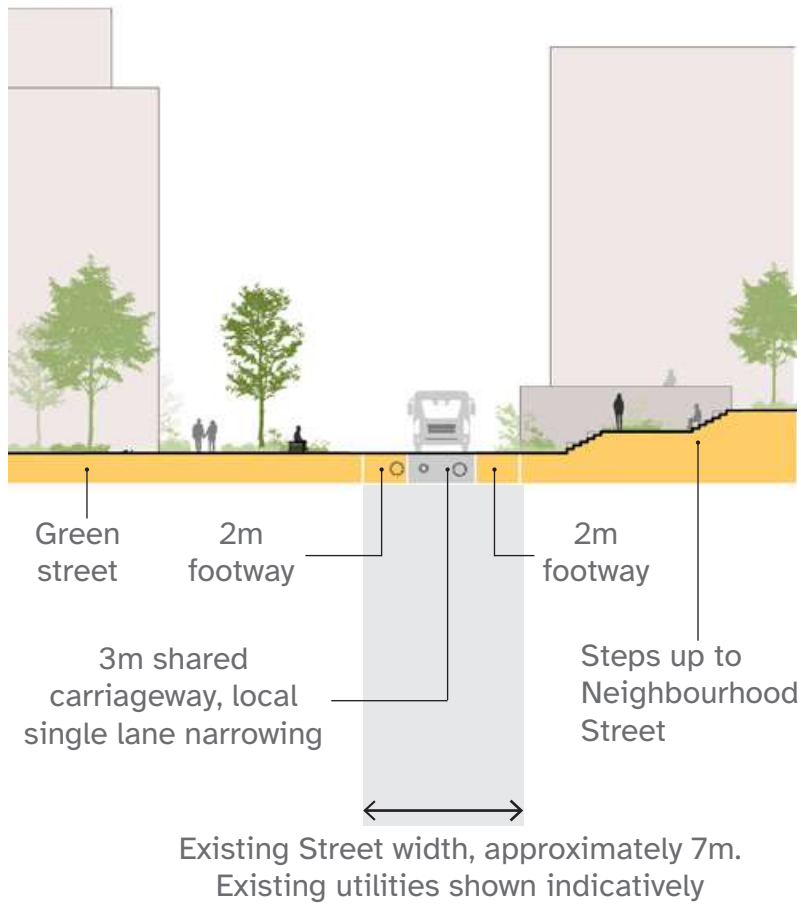
Illustration of one acceptable option



General principles as typical section 1 apply.

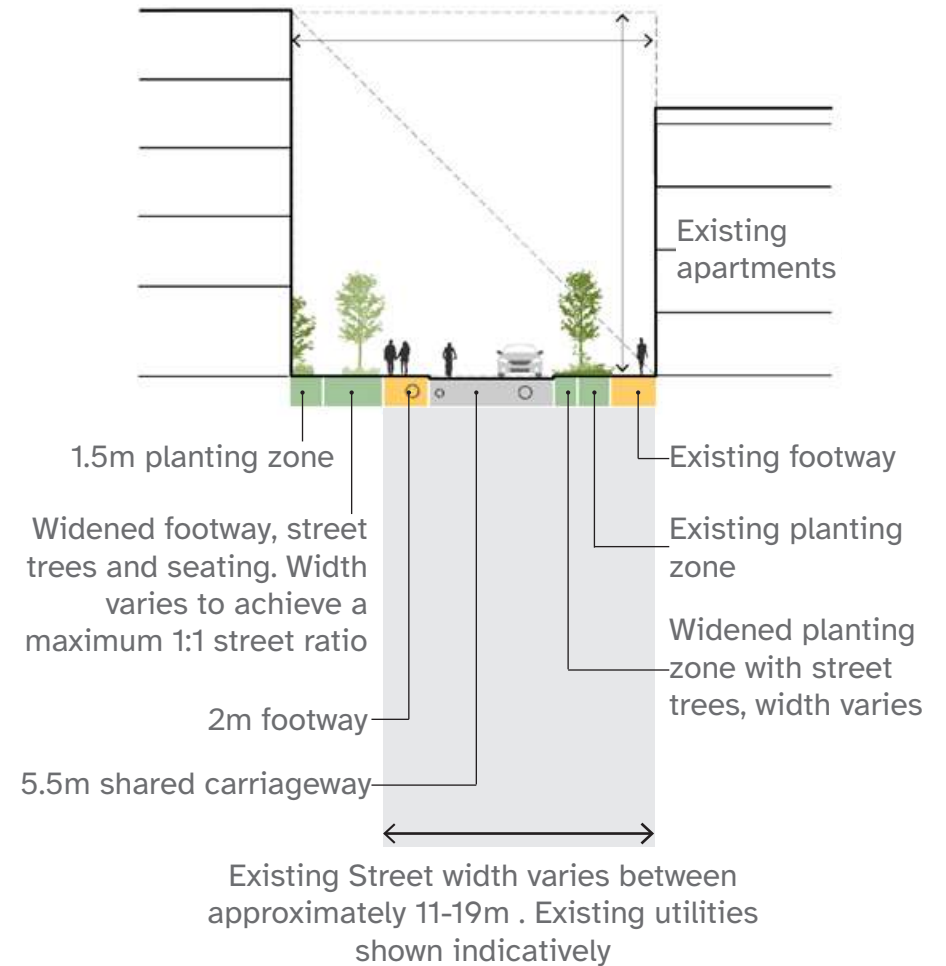
Water Lane Section 3: Neighbourhood Street

Illustration of one acceptable option



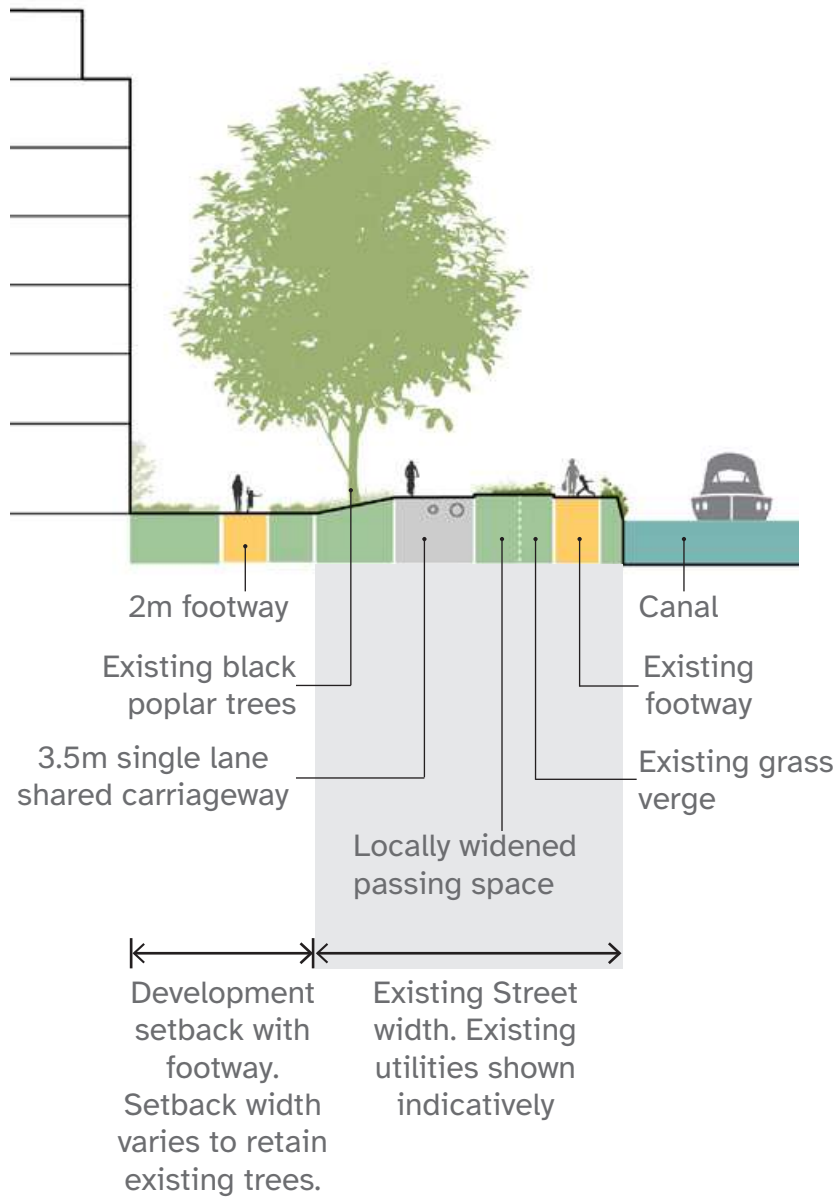
Water Lane Section 4: Gabriel's Wharf apartments

Illustration of one acceptable option



Water Lane Section 5: Canal

Illustration of one acceptable option



A15 – Neighbourhood Street

Role and function

The Neighbourhood Street connects Water Lane and the Neighbourhood Centre with Gas Holder Place and the Canal. It is the most important new street and forms a key part of the Neighbourhood Centre. The street should set a new high-quality benchmark for active travel priority streets in Exeter.

The street should be free from general through traffic and not accommodate access to parking (apart from blue badge spaces and servicing).

There should be a consistent building line and similar heights on either side of the street. Townhouses must not front the Neighbourhood Street.

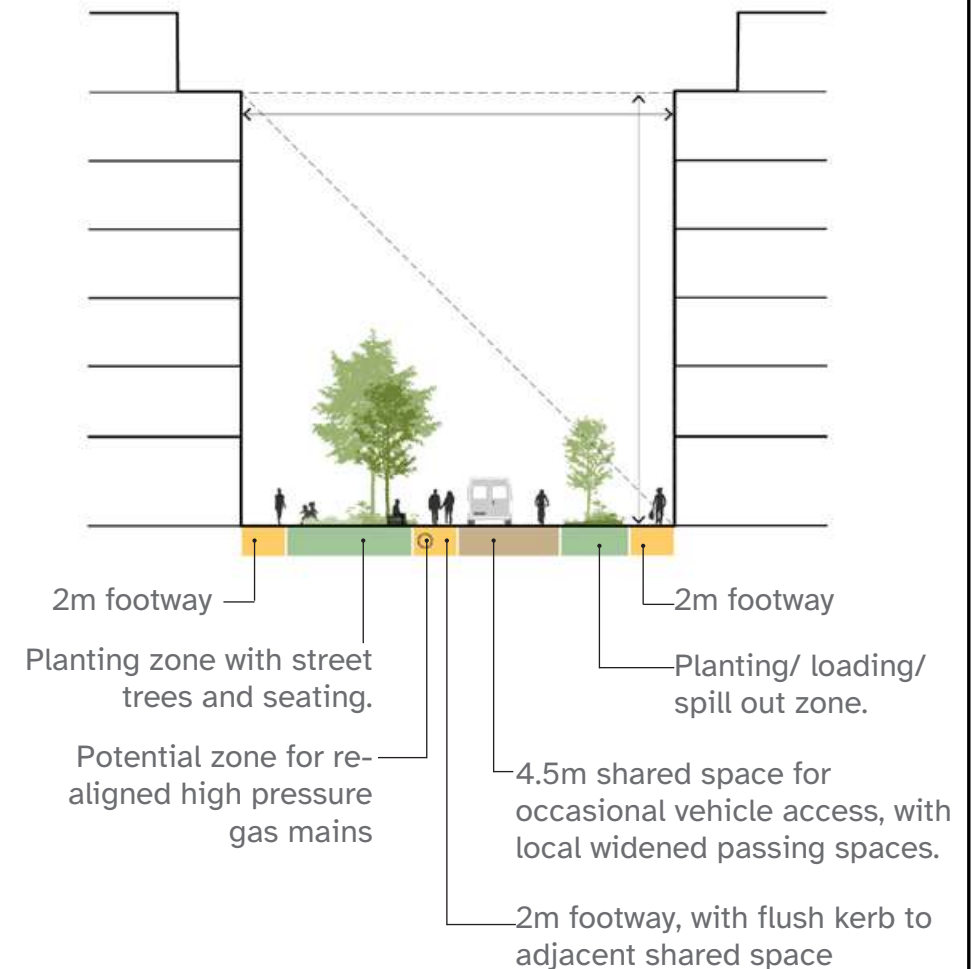
High quality, durable materials and street furniture should be used, which emphasise the importance of the street.

The Neighbourhood Street has space for trees, planting, and play.



Neighbourhood Street, typical cross section

Illustration of one acceptable option



A16 - Haven Road/Maritime Court

Role and function

Haven Road should be transformed into an active travel priority street with traffic kept to a minimum. This will be enabled by redirecting traffic to the public car parks and the industrial estate via Water Lane. Existing residential clusters and the proposed boat storage will be accessed from Haven Road.

Space should be safeguarded to accommodate a bus route, emergency vehicles and servicing.

The street should have a wide raised table crossing adjacent to Piazza Terracina to make it easy for pedestrians to cross.

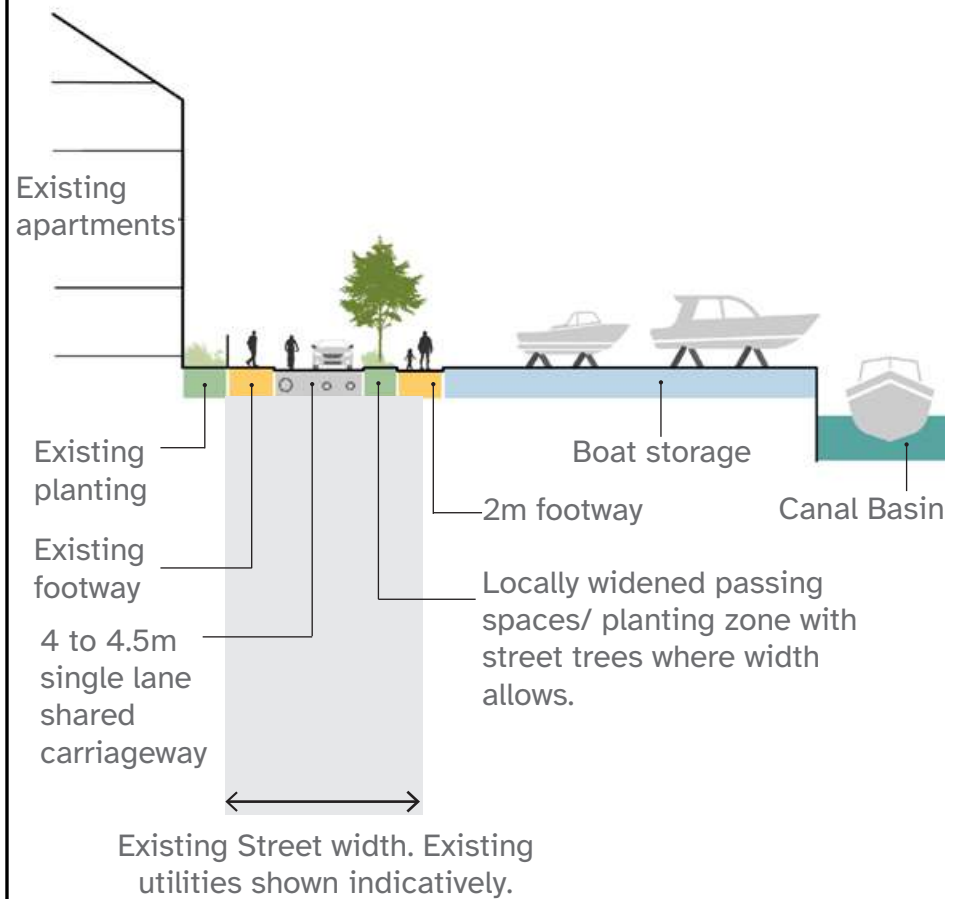
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Limited vehicle access, a reduced carriageway width and low kerb create a street which prioritises active travel, Gloucester Docks.

Maritime Court, typical cross section

Illustration of one acceptable option.



A17 - Foundry Lane

Role and function

Foundry Lane will be the main vehicle access route for development to the south of Water Lane. It will also be used to access existing homes on Cotfield Street and Gabriel's Wharf to keep sections of Water Lane free from general traffic.

Space should be safeguarded to accommodate a bus route, emergency vehicles and servicing. Cycling can be accommodated within the carriageway, as long as anticipated traffic flows are below the threshold as set out in LTN 1/20.

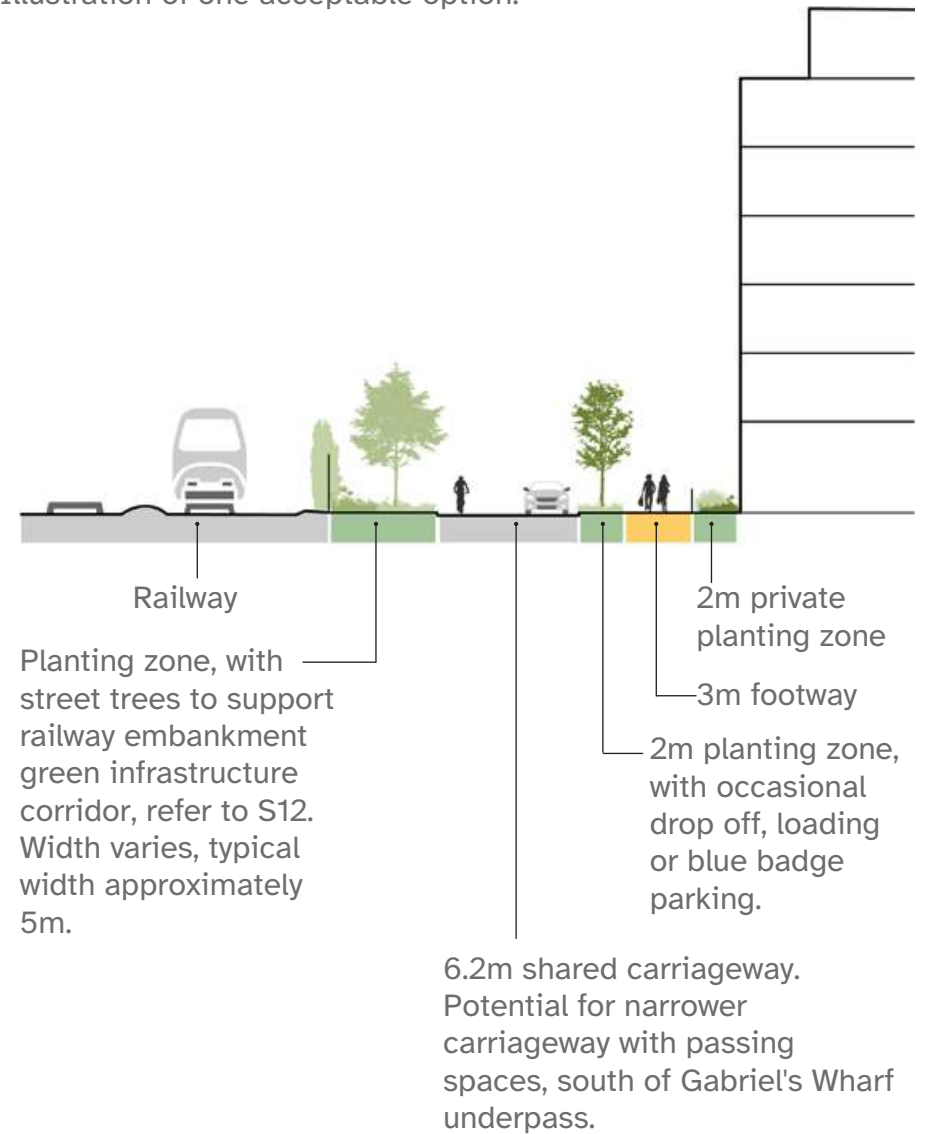
Whilst Foundry Lane will be a route for vehicles, it must be designed to give priority to active travel and be a pleasant street for people. It should incorporate planting, trees, seating, have active frontages and be easy to cross.



Generous planting separates the carriageway from the footway and apartment buildings at North West Cambridge.

Foundry Lane, typical cross section

Illustration of one acceptable option.



A18 - Tan Lane

Role and function

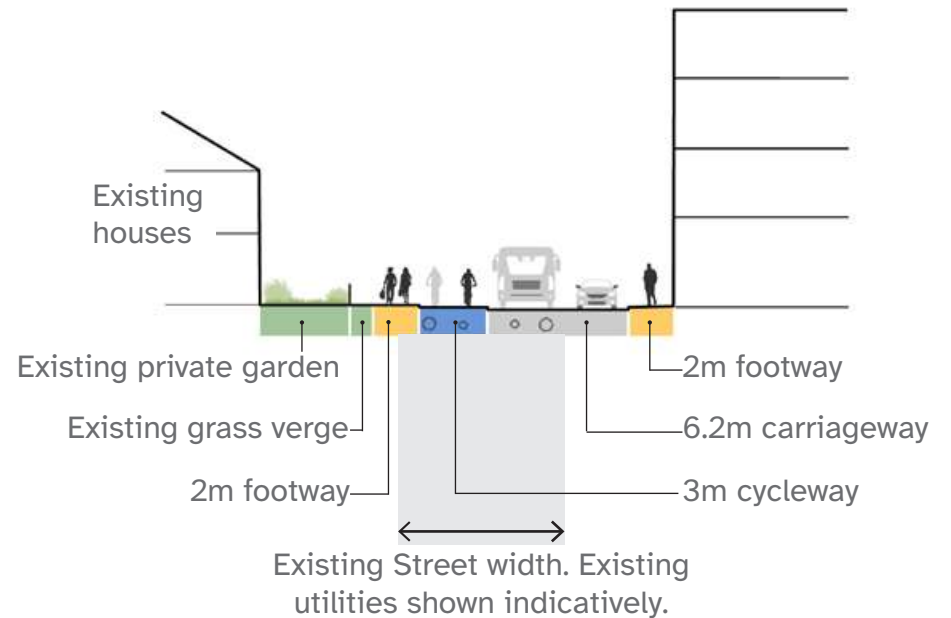
Tan Lane provides an important active and public travel connection between Water Lane and Marsh Barton.

South of Foundry Lane, Tan Lane should provide a route for public transport through a re-opened underpass opening under the railway and an enhanced active travel route through the existing underpass.

North of Foundry Lane, Tan Lane should be the main vehicle access for development to the south of Water Lane. The strategic long term active travel route from Marsh Barton must be prioritised whilst accommodating Tan Lane's important vehicle access function.

Tan Lane, typical cross section

Illustration of one acceptable option.



Segregated cycle lane, Manchester.

A19 - Michael Browning Way

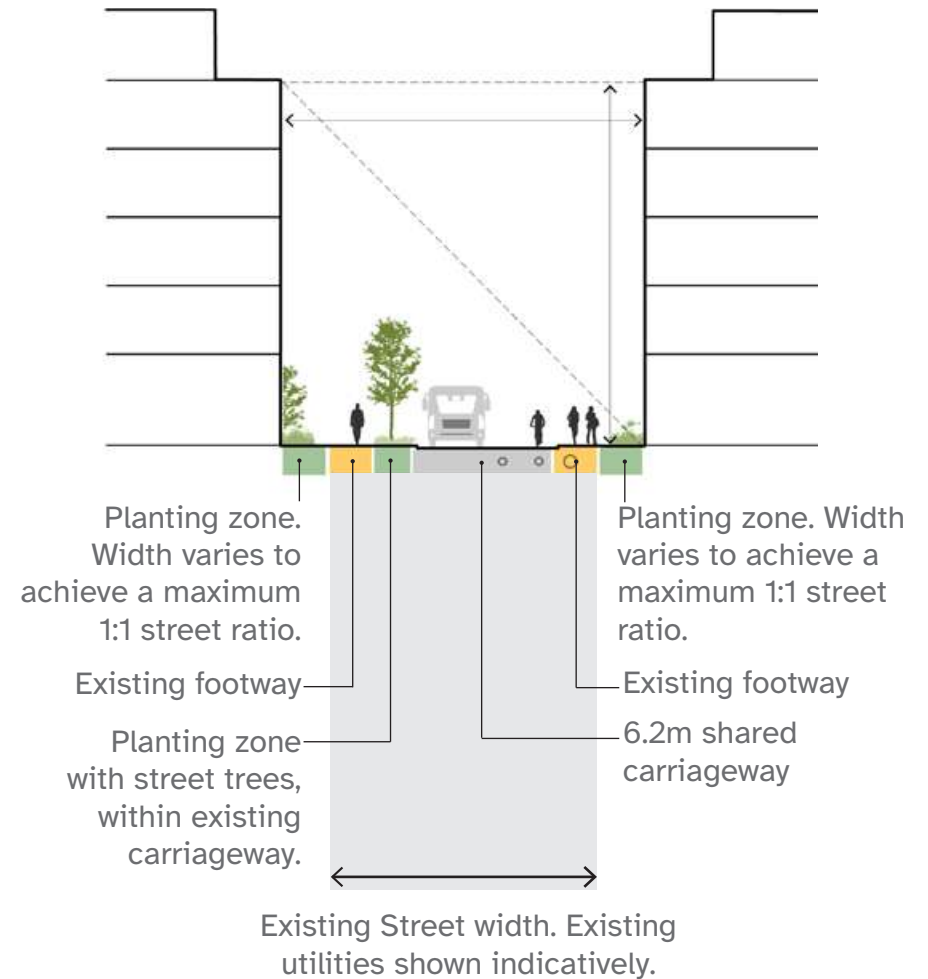
Role and function

Michael Browning Way will be extended to connect with Water Lane. The new southern section of the street will be the main vehicle access route for development to the north of Water Lane, including public parking within the mobility hub.

The existing northern section of the street will be safeguarded to accommodate a bus route, emergency vehicles and servicing. A bus gate or other modal filter could be provided within the existing northern section to stop general through traffic and support low traffic volumes on Haven Road/Maritime Court.

Michael Browning Way, typical cross section

Illustration of an acceptable option for the northern section.



A20 - Northern site access

Pedestrian movement

Convenient and safe pedestrian routes must be provided linking key walking routes as they enter the site. Generous widening of the public realm with street trees should be provided where routes converge at the junction between Tan lane and Water Lane, and the junction between Tan lane and Foundry Lane. Secured by design principles should be adhered to, with natural surveillance of routes.

Cycle movement

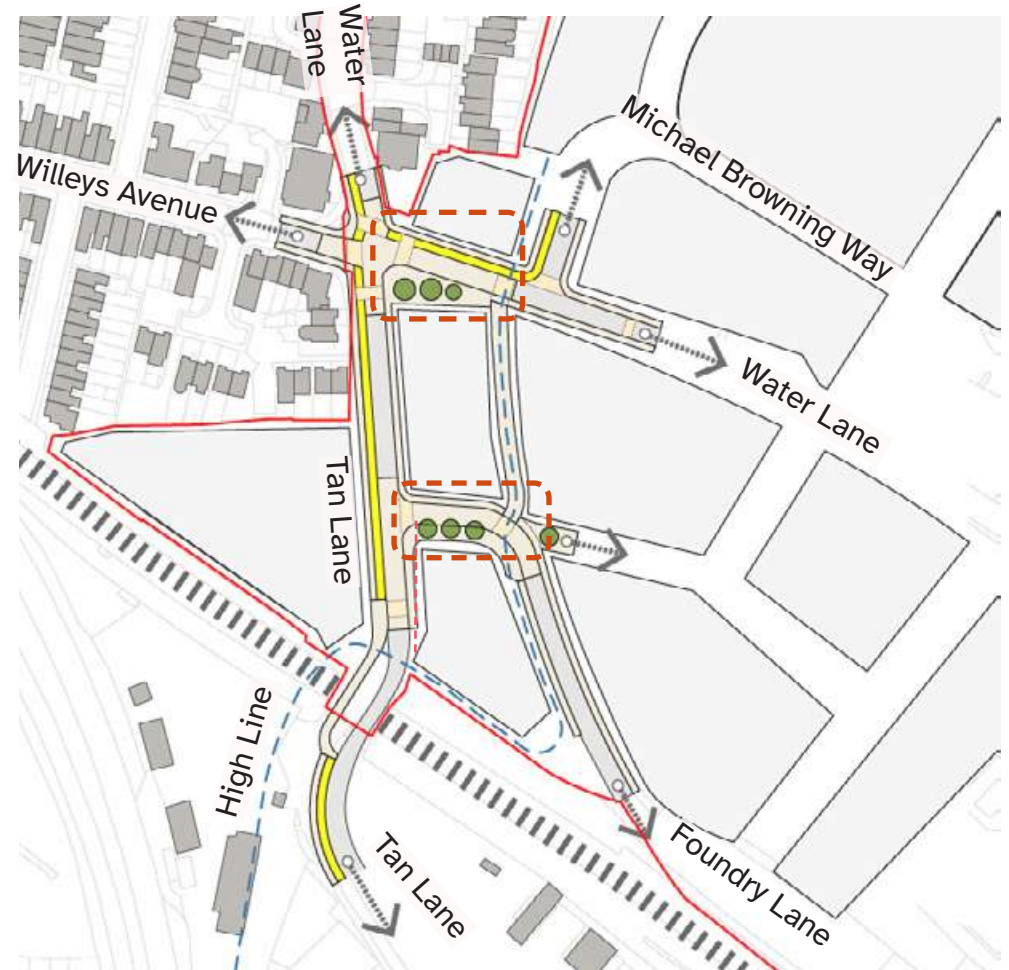
Tan Lane and Water Lane will form a key desire line in the future to the City Centre from Marsh Barton. This should be treated as a key route with direct and coherent segregation of cycle traffic. A segregated cycle connection should also be made to the shared carriageway within zone 2 of Water Lane, refer to A14.

Vehicle movement


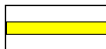

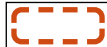
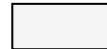
The access strategy should allow for access to the north and south of Water Lane to be formed independently. Opportunities should be taken to minimise unnecessary road space for vehicles through the provision of dedicated passing areas for larger vehicles, single lane sections, and street radii designed for low speeds.

Flood egress and access

Proposals must consider providing attractive and convenient connections to the 'high line' and strategic flood routes through the Water Lane area, refer to section A10.



Legend

-  Footway/ shared use
-  Cycleway
-  Indicative high level flood egress route
-  Entrances to the site with widened public realm
-  Indicative development blocks

Illustrative acceptable arrangement for northern access to the Water Lane area.

A21 - Green Streets

The Green Streets are multifunctional streets which:

- Must provide connections for active travel to the waterfront.
- Must be designed to function as linear green/blue spaces with biodiverse planting, sustainable urban drainage, play and seating which help to connect the neighbourhood and the railway embankment with the Canal.
- Can accommodate access for emergency vehicles, servicing and drop-off/loading for residents but must be free from general through traffic and not provide access to resident parking other than for blue badge holders.
- Can accommodate bus access on one of the links between Foundry Lane and Water Lane.

Proposals should explore creative and innovative designs which can set a high quality benchmark for green streets in Exeter.

The street width should be determined by the quantum of sustainable urban drainage required and the height of the buildings but should not be less than 12 metres. The width of the movement corridor should be kept to a minimum.

Where streets are unadopted these must allow public access, and a robust management and maintenance strategy must be agreed. Stewardship models should ensure that residents have a say in how and who manages the streets they pay a service charge for.



Raingardens and seating with movement being secondary function



Narrow movement corridor which can accommodate emergency vehicles and servicing

Examples of Green Street design with rain-gardens, street trees, doorstep play, seating, visitor bike parking, planters with climbers onto building and space for emergency vehicles and active travel.



A22 - Green Lanes

The Green Lanes are multifunctional lanes which:

- Must provide connections for active travel to the waterfront.
- Must be designed to function as linear green/blue spaces which help to connect the neighbourhood and the railway embankment with the Canal. The lane should include plenty of biodiverse planting, trees for pollution mitigation and pollination and sustainable urban drainage as well as space for play, food growing and seating.
- Have a minimal mobility function for vehicles and sit below green streets in the mobility hierarchy.
- Can accommodate access for emergency vehicles, but must be free from general traffic and not provide access to parking.
- Must provide glimpse views through the development from the waterfront to the hills, where the lanes connect directly with the Canal.
- Must accommodate changes in level along the lane to provide step free access and avoid blank frontages and large undercrofts for example through stepped ground floors and regular building entrances.

Where lanes are unadopted these must allow public access, and a robust management and maintenance strategy must be agreed. Stewardship models should ensure that residents have a say in how and who manages the streets they pay a service charge for.



The Green Lanes only have a very minor movement function and can be very informal in character.

Space for socialising and play





Green lane with an informal arrangement and character of a green space more than a street, whilst still accommodating access for emergency vehicles.

Site connections

A23 - Canal crossings

A new active travel crossing of the Canal should be provided to increase pedestrian and cycle permeability and improve access to the River Valley Park from the Water Lane area. Proposals must ensure the continued navigation function of the Canal and provide proposals for future management and maintenance. Feasibility work will be required including engagement with canal stakeholders.

Improvements to existing canal crossings should also be considered.

An assessment of the likely distribution and assignment of pedestrian and cycle traffic to the north and east should be undertaken to ensure that both existing and proposed crossings are fit for purpose.

A24 - Canal tow path

Options should be explored to widen the Canal tow path to accommodate cycle use, an increase in pedestrian users and the ability for people with mobility scooters, wheelchairs and prams to safely pass other users.



Contemporary canal bridge, Queen Elizabeth Olympic Park, London

Narrow section of towpath in front of Gabriel's Wharf apartments.



A25 - Railway crossings

Upgrading existing crossings of the railway must be a priority to enable strong active travel links to and from the south.

Tan Lane underpass

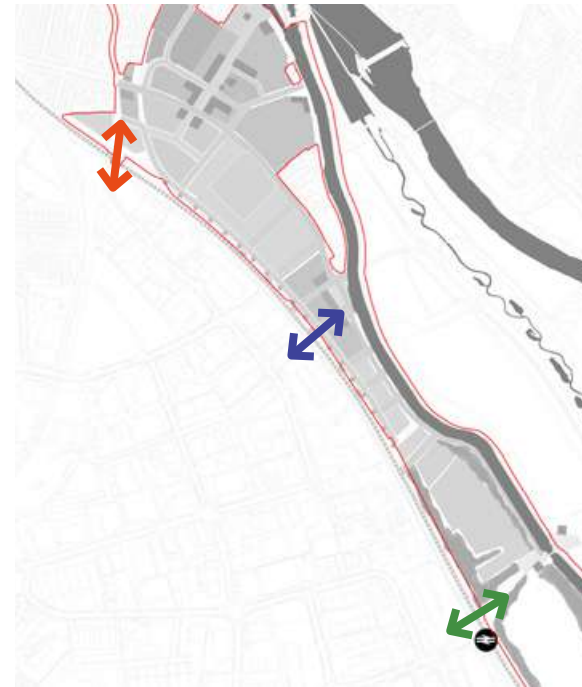
The second underpass should be opened up to accommodate future bus services, and the existing underpass converted to active travel use. This will allow segregation of pedestrian and cycle movements from existing vehicular traffic.

Gabriel's Wharf underpass

The link should be improved to achieve a convenient, attractive and safe, step free crossing, over or under the railway. This may require provision of a new subway structure, or alternatively a bridge may be considered. Proposals for Foundry Lane will need to consider the impact if this crosses over the underpass route, and how a safe and attractive route can be created.




Clapperbrook bridge

The provision for a future bus route should be safeguarded across the Clapperbrook Bridge and through the Water Lane development.



Plan of railway crossings

Legend

-  Tan Lane underpass
-  Gabriel's Wharf underpass
-  Clapperbrook bridge



Underpass with good sightlines and daylight, Burgess Park, London

A26 - Off-site connectivity and improvements

Development proposals should explore opportunities to improve active travel links to key destinations, including connections to nearby routes in the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) being produced by Devon County Council. Key destinations include the Quay, the City Centre, Marsh Barton, St Thomas, St Leonard's, the RDUH Hospital, Exeter University and employment areas on the edge of the city. Applicants should collaborate with the local authorities to identify off-site contributions to support a low-car neighbourhood.

Applicants must demonstrate that traffic impact can be mitigated to an acceptable degree.

Key off-site links which should be considered include:

- ① Exe bridges
- ② Alphington Road
- ③ Haven Road
- ④ Connections to Cricklepit bridge
- ⑤ Trews Wier bridge
- ⑥ Tan Lane and Exton road within Marsh Barton
- ⑦ Salmon Pool river bridge
- ⑧ Alphin Brook Road
- ⑨ Connections to RDUH Hospital
- ⑩ New river crossing - location indicative

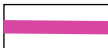

To the University
of Exeter and St
David's Station

City centre



Off-site connectivity plan

Legend

-  Key existing and proposed active travel routes
-  Potential future 'high line' route, refer to strategic flood access and egress A10.



4.8 Spaces for people and wildlife

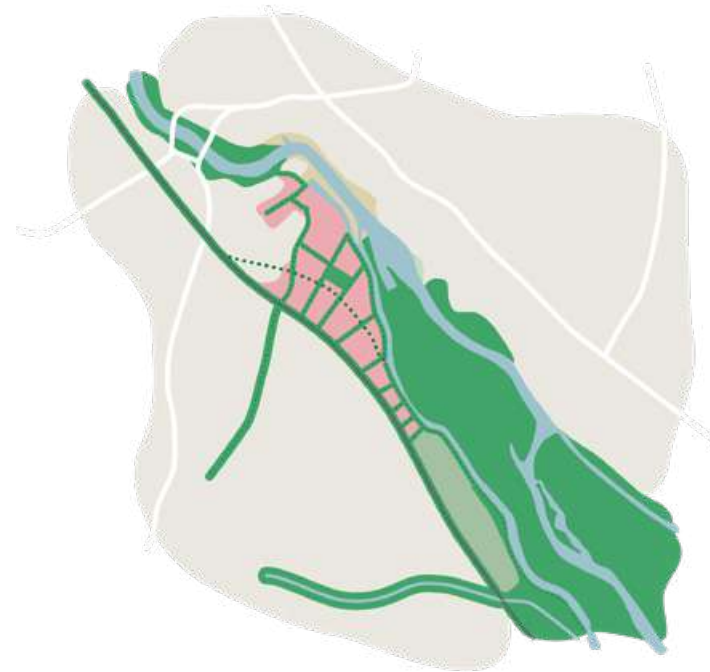
The City-wide ambition: Exeter's urban and natural spaces are attractive and well-connected environments well used for recreation, active travel and for supporting wildlife.

Connecting with the Canal, River & Valley Park

Page 409

Future Vision for Water Lane: Wherever you are in Water Lane, you're always close to nature. Homes look out onto planting and trees and have access to communal green spaces. Green streets and lanes, with an abundance of planting, bees and butterflies, lead you down to the waterfront. By the Canal, one of Exeter's most important natural corridors, you can often spot herons and kingfishers. Bats are thriving thanks to innovative lighting systems in streets and buildings and plenty of safe spaces for them to forage and seek shelter. You're spoilt for choices to explore nature with both the vast Riverside Valley Park and Exeter Green Circle on the doorstep. On the community green space people gather for picnics, birthday celebrations or just to sit and read a book in the sunshine.

The large raingardens, retained and new trees and green walls and roofs have become a national best practice exemplar for creating climate resilient places, providing cooling spaces during heat waves and helping to manage heavy rainfalls.








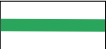




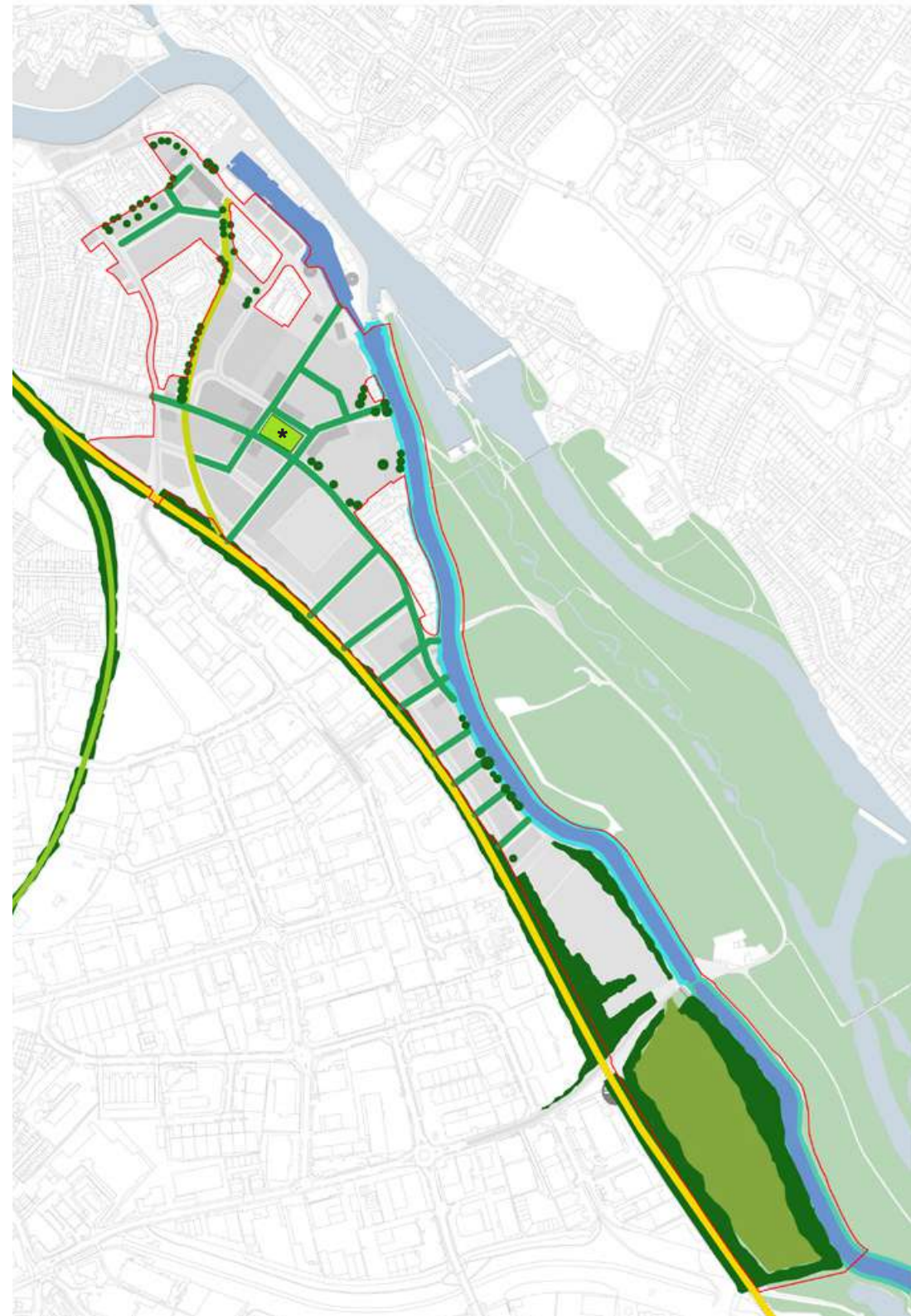
Site wide codes

S01 Green infrastructure plan

Proposals for green infrastructure should follow the green infrastructure plan.

Legend

-  Riverside Valley Park
-  River
-  Existing trees and vegetation (S03, S07)
-  Community green space (S12)
-  Canal corridor (S13)
-  Railway embankment (S14)
-  Grace Road Fields (S15)
-  Streets with important green/blue infrastructure role
-  Other green corridor
-  Disused railway (the High-line)



S02 Open space

Proposals for residential development should provide a range of open space in accordance with the Fields in Trust benchmark guidelines.

All new open space should:

- Be located to ensure easy access from all parts of the development and from the wider area.
- Be designed to be safe and secure, with clear sightlines, good, energy-efficient lighting, and appropriate landscaping.
- Be designed to be inclusive and accessible to all, regardless of age, ability, or background.
- Be integrated into the wider pedestrian/cycle network and green/blue infrastructure network.
- Be well overlooked with frequent windows and building entrances onto the spaces.
- Be high-quality, using planting, materials and furniture that will age and weather well.
- Be multi-functional with a mix of things to see and do, such as play, grow food and socialise, and support other functions such as managing flooding and storing carbon.
- Have acceptable noise levels.

Proposals should make efficient use of space, such as designing low traffic streets as green spaces.

Proposals must demonstrate that open spaces are genuinely useable and suitable in design and size for their function.



Multi-functional spaces with planting and space to sit and move through, London & Oxford



Streets and spaces should be designed to draw the waterfront character further into the site, including incorporating sustainable urban drainage, wetland planting and raingardens.

The material palette, furniture and planting should be coordinated across the whole of Water Lane to ensure the public realm brings the development together.

A strategy for stewardship and ongoing management of spaces should be developed and agreed with the Council at an early stage. Development proposals will make provision for the on-going management and maintenance of open space to standards that have been agreed with the Council.

Stewardship models should ensure that residents have a say in how and who manages the spaces they pay a service charge for.

S03 Green and blue infrastructure

Proposals should provide a nature-rich environment with plenty of opportunities for people to have daily contact with nature, from greening buildings and small doorstep places, to improved connections to the Canal, the Riverside Valley Park and the Green Circle. Hard surfaces should be kept to a minimum and have a clear function such as for movement or space for events.

All development proposals should submit a Green Infrastructure Plan setting out how the development will link to existing green infrastructure (including the Canal, Riverside Valley Park, Exeter Green Circle and the railway embankment) and demonstrating how the development will contribute to the delivery of Exeter's Green Infrastructure Strategy. Where necessary, contributions to enhance green infrastructure, sustainable transport links and gateway access points will be sought.

The Green Circle will be protected as an important green infrastructure asset that links communities in a sustainable way whilst providing exercise, recreation and health benefits. Proposals should demonstrate how they will maximise connectivity to and enhancement of the Green Circle.

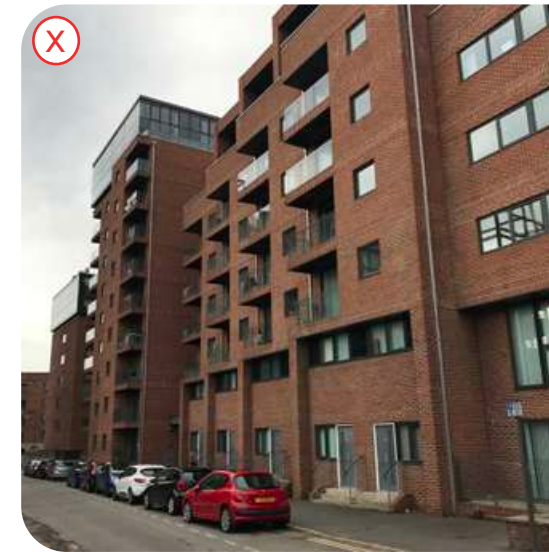
Development proposals should explore opportunities to support initiatives within the Riverside Valley Park as outlined in the Riverside and Ludwell Valley Parks Masterplan. Examples include naturalistic pocket parks, habitat enhancement along the Canal and River, the Bromham Farm Hub, a community orchard and forest garden.



Wildlife and people friendly green corridor, Battersea, London



Nature-rich urban high-density environment with plenty of opportunities for daily contact with nature within, Battersea, London.



High-density development not providing a nature-rich environment will not be acceptable.

S04 Biodiversity

Development proposals must demonstrate a thorough understanding of the ecological baseline and the opportunities for biodiversity enhancement. An ecological survey must be undertaken during early concept stage to inform the biodiversity net gain and open space strategy and shape the overall layout.

Development proposals must, as minimum, deliver biodiversity net gain in accordance with national requirements and the local plan. To support Water Lane as a City flagship project, development proposals are expected to be ambitious in delivering biodiversity net gain and exceed the minimum requirement wherever possible.

All development proposals will be required to follow the mitigation hierarchy and where relevant;

- Take steps to avoid affecting protected species, and, in all cases, ensure that disturbance to wildlife is kept to a minimum.
- 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.
- Contribute towards measures to mitigate against adverse effects on the Exe Estuary SPA and other nearby sites on the UK National Site Network.

Biodiversity enhancement should form an integral part of the green/blue infrastructure and open space provision and provide multiple benefits wherever possible, such as making a street or space more attractive for people and supporting flood management.



It's important development proposals consider all aspects of improving biodiversity from planting and furniture in small spaces to large green/blue infrastructure corridors.

Development proposals must strengthen existing important habitat corridors along the Canal and the railway embankment and maximise habitat connectivity between these corridors and to the Riverside Valley Park through new east-west green/blue corridors.

Bat and bird boxes should be incorporated within the development in line with best practice guidance.

See S11 for further requirements for the Canal and S12 for the railway embankment.

S05 Urban Greening Factor (UGF)

Development proposals are encouraged to include:

- The latest version of Natural England's Urban Greening Factor (UGF) calculator demonstrating how the development will achieve UGF scores of at least:
 - a. 0.3 for predominately commercial development.
 - b. 0.4 for predominately residential development (or 0.5 for predominantly greenfield residential development).
- An operation and maintenance plan which satisfactorily demonstrates that the green features will be successfully retained throughout the life of the building.



High-density development achieving UGF through green roofs and predominantly green open spaces, International Quarter London



Raingardens incorporated within streets and hard impermeable surfacing kept to a minimum, Leeds Climate Innovation District.

S06 Sustainable Drainage Systems (SuDS)

Nature-based solutions, such as raingardens, should be used for drainage wherever possible. Green streets and green lanes are expected to accommodate a large proportion of SuDS within the street.

Permeable paving and soft landscaping should be used wherever possible to slow water runoff.

SuDS must be designed in accordance with best practice guidance, be multi-functional wherever possible and avoid over-engineered solutions.

S07 Trees

All new streets must be tree-lined.

Existing trees should generally be retained, and removal of trees must be clearly justified and compensated for by planting new trees. A tree survey must be undertaken during early concept stage to ensure existing trees shape the design proposal from the outset and are well integrated into the design.

Development proposals are encouraged to increase the tree canopy cover by at least 5.5% when compared with the pre-development baseline.

Tree species should be selected that:

- Are predominantly native.
- Are resilient to an urban environment and future climate change.
- Have biodiversity value supporting native insects and pollinators.
- Have visual interest and a height and canopy spread suitable to their location.

The size of trees and tree pits should be of a suitable size to ensure that they establish well and have future healthy growth.

Trees must be located and planted to ensure that they are not damaged during construction and can be accommodated in the final development once they are fully mature.



The black poplars along the Canal are important trees for wildlife and the character of the area.



Planting along path with species to support native wildlife and help form ecological network, London

S08 Planting

Development proposals should maximise every opportunity to incorporate planting into streets and spaces to ensure the development overall is nature-rich.

Planting must be resilient to an urban environment and future climate change.

Planting should predominantly be species that directly benefit wildlife e.g. through nectar or berry production, or providing shelter and materials. Planting schemes should form ecological networks through the built environment and include native species which can be used by pollinators and native fauna.

Planting beds must be designed and sized to ensure an adequate growing medium for healthy and robust planting.

A clear maintenance regime for planting should be put in place.

S09 Play

Development proposals should make suitable provision in accordance with the Council's Play Strategy guidance.

Play areas should be easy to access, centrally located and well integrated with the overall design.

Play areas should include multi-sensory features for children and young people of all ages.

Nature based play features, including water features are encouraged.

Local areas for play (LAP and LEAP) should be provided on site.

Neighbourhood equipped areas for play (NEAP) and playing pitches can be provided off-site through financial contributions where existing play facilities can be upgraded.

A strategy for ongoing responsibility and maintenance of play spaces should be agreed with the Council.



Small incidental play area incorporated within street, Alfred Place, London.

S10 Food growing

Smaller community growing areas should be provided within development sites near where people live. This could be in incidental spaces or streets without an important transport function. These areas should encourage community initiatives and resident involvement in shaping the spaces, such as 'Incredible Edible'.

Allotments can be provided through financial contributions for new allotment sites near Water Lane. The quantum of allotment space should be in accordance with the Fields in Trust Benchmark Guidelines.

A strategy for ongoing responsibility and maintenance of growing areas and allotments should be agreed with the Council.



Play area catering for children of all ages, Islington, London.

S11 Residential open space

All dwellings must have access to a suitable amount and type of open space. The suitable quantum should be agreed with the Council early in the design process.

Most open space should be provided as communal space.

The spaces should be well-designed, pleasant to spend time in, predominantly green, overlooked by the surrounding dwellings, multifunctional, have acceptable noise levels and receive sunlight for a substantial part of the day.

Streets and large roof terraces can count towards the total provision if they are complemented by communal open space, are predominantly green, are of high quality and applicants can demonstrate that this will meet the needs of the residents.

Development proposals must give all residents within a block equal access to open space and not segregate the open space by tenure or introduce private gardens at ground floor level that are not accessible to residents of upper floors

A strategy for stewardship and ongoing management of spaces should be agreed with the Council at an early stage.

Stewardship models should ensure that residents have a say in how and who manages the spaces they pay a service charge for.

Balconies should be provided for all dwellings above ground floor, unless it can be clearly justified that this is not suitable or feasible.

Rear private gardens may be suitable where townhouses are proposed, subject to constraints.



Communal open space which is large enough for children to run around and include a small play area, trees, planting and places to sit, Malmo, Sweden. © La Citta Vita



High quality communal space for residents incorporating planting, seating and water features, Wembley, London.

Public spaces codes

S12 The community green space

A local green space should be provided within or near the Neighbourhood Centre on key pedestrian and cycle routes.

The space should:

- Be a predominantly green space for local people to meet which complements the larger hard surfaced city spaces at Piazza Terracina and the Quay.
- Be intimate and community oriented with places to sit and relax which complement the function and character of the larger Riverside Valley Park.
- Incorporate water as a key feature of the space.
- Integrate areas for play.
- Contribute to BNG, UGF and water management.
- Have buildings with active ground floors and community uses fronting onto the space.
- Help connect the waterfront with the Neighbourhood Centre and Water Lane (the street).
- Be of a suitable size to accommodate the above described functions. Suitable local precedents in terms of size include Devonshire Place (St James), Mont Le Grand (Heavitree) and Queens Crescent Gardens (St James).

If a larger space is provided, a small pavillion building within the space may be acceptable if it supports the use of the space.



Play and water features incorporated within multifunctional space, London & Peterborough



A local space for people to socialise, relax, play and have contact with nature. Coin Street, London.

S13 Canal

Development proposals must protect and maximise enhancement of the Canal which is an important recreational corridor and a County Wildlife site that connects with the Riverside Valley Park and the Exe Estuary (SPA).

The Canal edge must be predominantly natural to give plenty of space for wildlife and retain the natural character of the Canal. Hard edges should be kept to a minimum and used only where needed to access the water.

The Canal is an important bat corridor which must be protected. Proposals must demonstrate that the movement and roosting of bats is fully understood and has been considered early in the design process. Removal of riverside vegetation and introduction of artificial light must be avoided wherever possible or minimised with impacts fully identified and mitigated.

Lighting along the Canal must be carefully considered early in the design process to avoid impact on bats and other wildlife, whilst providing routes that people feel safe to use. Ecologist and lighting consultants should be included within design teams at an early stage. The main sources of lighting that needs to be considered are

- Lighting from adopted highways close to the Canal, predominantly Water Lane (the Street).
- Lighting of the Canal towpath.
- Lighting of bridges over the Canal.
- Lighting from buildings, both internal and external.

Potential design solutions to consider include:



The existing natural edge is an important characteristic of the Canal and for supporting wildlife.

- Limiting the amount of artificial light.
- Limiting the time lights are on, both internally and externally, e.g. through timers and motion sensors.
- Reducing light intensity including dimming of lighting.
- Directing lighting away from sensitive areas, for example one-side light bollards.
- Using building set-backs, building orientation, balconies, louvres and tinted windows to reduce light spill from internal areas.

Safety measures along the Canal should be considered, including the design of public space and integration of life-saving equipment.

S14 Railway embankment

Development proposals must protect and enhance the railway embankment which is an important wildlife corridor. This could include features such as planting to improve the visual appearance of the embankment and community growing areas.

Proposals must include frequent green corridors between the railway embankment and the Canal that are attractive for both people and wildlife.

S15 Grace Road Fields

Grace Road Fields is a wildlife, nature and renewable energy opportunity site and proposals should strengthen its role as an important site connecting Water Lane, the Riverside Valley Park, Marsh Barton and its station, both for people and nature.

Proposals for Grace Road Fields should be developed in collaboration with the Council and other stakeholders to ensure a comprehensive strategy for the future use of the site.

Development proposals for other sites in Water Lane should explore opportunities to support proposals for Grace Road Fields.

Proposals should prioritise uses which:

- Enhance nature and biodiversity, particularly along the Canal and the railway embankment.
- Establish the area around Marsh Barton station as a regional destination for recreation and water-related activities.



Wildlife friendly and attractive planting on embankment, London Olympics Park



Nature-based destination play area, Burgess park, London

- Improve recreational opportunities, particularly along the Canal and near the station.
- Improve access to the Canal, particularly along the Canal and near the station.
- Improve connections for people walking and cycling between Marsh Barton, the station and the Valley Park.

Uses that are being considered for Grace Road Fields include, BNG habitat bank, woodland creation, recreational area, wildlife hub, canal basin/marina, sports and recreation hub, energy centre, allotments and solar farm. The Riverside and Ludwell Valley Parks Masterplan should be used for ideas and reference.

See W12 Clapperbrook Hub for reference on the local node partly within Grace Road Fields.



4.9 Connected culture

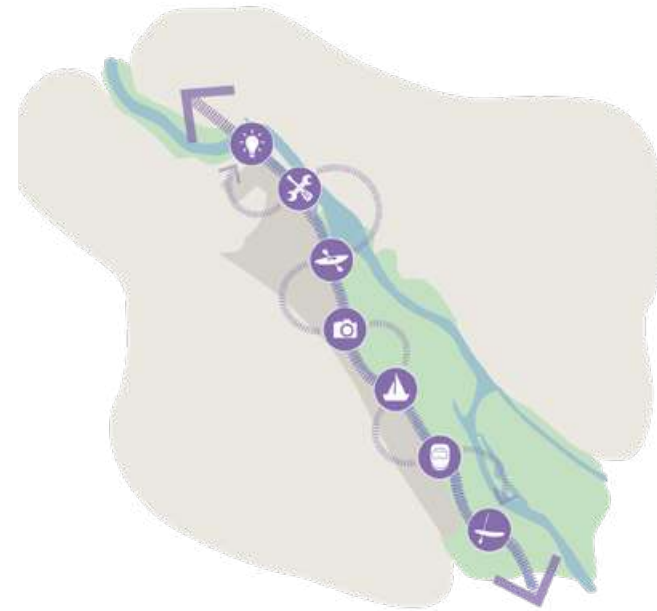
Exeter has a diverse and accessible cultural offering, connecting our world leading climate science, arts and literature, heritage, learning and innovation.

A dynamic maker community

Page 421
Future Vision for Water Lane: Water Lane is Exeter's creative water quarter. Makers, crafters and artists have established a strong community within the affordable commercial spaces. They work alongside residents, students and visitors as an integral part of the place.

Water lane is a place of change. The enterprising and resourceful spirit of the area is expressed through temporary uses; a former industrial unit becomes an indoor skate park, a vacant site hosts a festival, projections light up the Gas Works office and spark visions of what the place can be.

Water Lane is defined by the water. The cultural heritage of the place is embedded in the buildings, streets and spaces. The leaf-dappled light on the canal is reflected in an ornate decorated metal screen. A weathered steel planter reminds people of the industrial boat building.



Culture-led development

The key creative and scientific sectors, such as climate science and literature, are cultural drivers for development across the city. Exeter City Council is developing ideas for how culture can inform placemaking across the city. Embedding culture within placemaking will support the emerging identity of Water Lane and create a strong base for future investment and success.

C01 - Culture led development

Proposals should:

- Identify opportunities for collaboration and co-creation in building design and operation, with local arts, science and education organisations and groups. Examples could include utilising the construction skills and education opportunities at Exeter College, embedding a deep understanding of the history of the site through collaboration with the Royal Albert Memorial Museum, or co-creating architectural features and public art with local artists.
- Explore opportunities to express local culture through the design of buildings and infrastructure. Refer to M01-M04 for further details on context analysis, character and cultural identity.
- Identify opportunities to integrate public art within developments.



Water front regeneration, incorporating public art and retained historic features, Gloucester



Street art enlivens former industrial buildings, Liverpool.



Maritime heritage of the Exeter Ship Canal



Brick and steel architectural details responding to the historic context, Manchester

Public realm placemaking

Streets, paths, squares and green spaces offer opportunities to weave-in local influences to support a sense of place and cultural richness.

C02 – Public realm placemaking

Proposals should ensure the design of the public realm considers opportunities for embedding culture. This includes a thorough understanding of local historic and cultural identity as outlined in M01-M04. Opportunities to engage with local community and arts groups in the design of spaces should be explored. The opportunities will vary depending on the type and size of space size but may include:

- Innovative street furniture, signage and wayfinding, lighting, public art and street art. Refer also to the Public Art Strategy for Exeter.
- Spaces which enable festivals, events, theatre, projection, carnival, pageants and processions.
- Creative interventions within the hard and soft landscape design.
- Temporary art installations may also be appropriate, outlined in C04.



Outdoor cinema, Jubilee Square, Leicester. Image credit. Ian Davis/LCQPB.



Diamond ring light installation, Union Terrace Gardens, Aberdeen



Comedy Carpet artwork, Blackpool

Creative industries

Through the creation of new commercial floorspace and the transition of the area towards an integrated, denser, mixed-use neighbourhood, there is an opportunity to create significant flexible space for the creative industries which does not currently exist in Exeter. This could accommodate studios, workshops, labs and units for makers, artists and researchers, as well as more office-based uses.

C03 – Creative industries

Proposals should accommodate space suitable for creative and digital businesses ensuring there is affordable workspace for the future. Refer also to W07 employment opportunities and W02 Land Use Plan for guidance on the most appropriate location for these uses.

Page 424



Temporary market, creative workshops and festivals, Refshaleoen, Copenhagen



Vacant space bought into positive creative use, Cains Brewery Village, Liverpool

Meanwhile uses

Water Lane currently has several vacant sites which are awaiting development. These sites offer a great opportunity for creative meanwhile uses that can add to the vibrant and diverse identity of the area. Meanwhile uses can be invaluable in giving places an identity through generating local activity and interest and can provide a platform on which to build a future community, very often resulting in permanent or semi-permanent outcomes. On larger industrial sites it may be appropriate for some meanwhile uses to focus on the public facing edges.

C04 – Meanwhile uses

Proposals should consider temporary uses for sites which can contribute positively to the character and vibrancy of the area. Appropriate uses may include events, markets, urban farms, public spaces and public art.



A mixed use district with creative tenants, exhibition space, café's and residential units, Paintworks Bristol

City culture hub

At Water Lane there is an opportunity to provide cultural attractions which benefit from the natural and urban character of the site and its central location.

C05 – City Cultural Hub

Development proposals should consider opportunity for the provision of cultural uses and attractions. Proposals should use the unique character of the area, including the Valley Park, Ship Canal, built heritage and active outdoor community to create a destination for residents, visitors and tourists.



Arnolfini, international contemporary arts centre, Bristol



Playspace, London Olympic Park



Slimbridge Wetland Centre, Gloucestershire

Chapter 5

Delivering the Water Lane Vision

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5.1 Delivering a successful neighbourhood

The primary purpose of the SPD is to set out a clear vision for Water Lane and requirements for applicants to help achieve that vision. However, the SPD has also got a crucial role as a strategy and coordination tool for Exeter City Council (ECC), Devon Country Council (DCC) and other stakeholders to make decisions about infrastructure priorities and phasing, and how to make best use of public land and funding.

The essence of Liveable Exeter is that development delivers real benefits for people in the city, through transformation of its infrastructure and public realm. A welcoming neighbourhood needs community facilities such as a school and a local shop to be delivered at an early phase. Active streets and spaces for people and wildlife needs to be designed and delivered as a coherent network, where landownership boundaries are invisible. Far too often these fundamental elements are left to last or don't get delivered at all, meaning a development is merely a collection of buildings rather than a cohesive neighbourhood.

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A collaborative process

There are several different landowners, developers and infrastructure providers within the Water Lane area and at time of writing, there is no master developer for Water Lane. This brings with it challenges for ensuring a coordinated and timely delivery of the infrastructure and public realm needed to deliver a cohesive neighbourhood. Exeter City Council will be leading the collaborative process required and are expecting all stakeholders to fully engage with this process. A joint delivery and phasing plan will be required at some point in the future once all infrastructure requirements for the whole area are fully understood.



Mayfield Park is an inspirational example of community infrastructure delivery: it's a new park by Manchester Piccadilly Train Station which has been created ahead of the planned residential development coming forward around it.

Infrastructure delivery

The SPD sets out specific requirements for on-site infrastructure where these are known. Where further work is required to determine the need and its impact on aspects such as viability, the SPD sets out the aspirations and the process for arriving at the best solution.

ECC are preparing an Infrastructure Delivery Plan (IDP) as part of the new Exeter Plan which set out the infrastructure required for Water Lane developments. The IDP and the collaborative process will help to ensure that infrastructure is planned and funded comprehensively. External funding may be sought for infrastructure where required.

Stewardship

Water Lane will only be a successful neighbourhood long-term if proposed developments have a clear and robust strategy for the ongoing stewardship of the area. The SPD includes codes for stewardship of resources as well as public streets and spaces. These codes require clear strategies for the future management and maintenance of streets and spaces to form part of development proposals. Some of the streets and spaces are local and might lend themselves to private management controlled by residents, whilst e.g. the Neighbourhood Street and the Community Green Space will fulfill a more public function for the whole local area and may need innovative approaches to stewardship such as through a Trust or a Community Interest Company (CIC).

Community engagement

The local community has ongoing stake in the future of Water Lane and are important in creating a successful neighbourhood. The local community has played an important role in shaping the SPD from the outset and a summary of the early engagement for the SPD is included in the appendices. They will continue to be involved on an ongoing basis in the stewardship and life of the neighbourhood going forward.

The SPD also sets out requirements for how applicants are expected to engage with the local community.

Viability

The delivery of this SPD will require coordination, agreement and negotiation across an extensive and diverse range of stakeholders. The delivery of individual sites within the allocation will be secured by separate planning applications prepared by landowners and/or promoters, working in close consultation with ECC and key stakeholders. These planning applications should be in accordance with the design principles and requirements for wider infrastructure delivery set out in the SPD as it will be a material consideration in the determination of planning applications once adopted by ECC. Viability assessments must be submitted with the planning applications to justify any proposed deviation away from policy compliant levels of affordable housing. Similarly, proposed deviations away from the Design Code principles and/or the funding of infrastructure requirements set out in the SPD should also be fully justified in viability assessment submissions.

There may be occasions where the principles set out in this guide impact upon the viability and deliverability of a development. In such circumstances, in accordance with paragraph 58 of the NPPF, there may be an opportunity for an applicant to argue a case for non-compliance on the individual viability of a scheme, but only when an open book approach to the viability appraisal is adopted. This does not, however, exempt the developer from utilising the appropriate professional inputs or adopting the design process, guidelines and requirements set out in this code in order to achieve the high-quality design outcomes required by the NPPF, the NMDC and National Design Guide. As such, developers should seek to deliver creative solutions to match the aspirations of the Design Code with the ultimate delivery of high quality, resilient and sustainable development.

Chapter 6

Appendices

6.1 Glossary of key terms

Several key terms are used within the document and defined below.

Active frontages

Building frontages where there is an active visual engagement between those on the street and those on the ground and upper floors of buildings.

Active travel

Modes of travel which include a level of activity including walking, wheeling and cycling.

Biodiversity net gain

An approach to the development of land which makes sure the habitat for wildlife is in a measurably better state than it was before development.

BREEAM

Building Research Establishment Environmental Assessment Methodology.

Design Code

A set of illustrated design requirements which provide specific, detailed parameters for the physical development of a site or area.

Development Framework

An illustrative spatial overview of development comprising information on mobility, land use and green infrastructure.

Future Homes Standard

Central government residential building standard which aims to reduce carbon emissions from new homes by 75-80% over current building regulations. Currently due to become mandatory in 2025.

Green & Blue Infrastructure

A planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services.

Healthy Streets Approach

A human-centred framework for embedding public health in transport, public realm and planning.

High Line

Potential future strategic active travel, and flood access and egress route on the disused railway line running through Marsh Barton.

Liveable Exeter 2040 Vision

A commitment made by the Liveable Exeter Place Board to be recognised as a leading sustainable city and global leader in addressing the social, economic and environmental challenges of climate change and urbanisation.

LTN1/20 Cycle infrastructure design

Department for Transport guidance to local authorities on delivering high quality cycle infrastructure.

Micromobility

A range of small, lightweight vehicles operating at speeds typically below 25 kilometres and hour, including bicycles, e-bikes, and scooters.

Mobility Hub

Co-location of shared transport with public transport, and active travel facilities. This can include bike share, bus stops and car clubs for example.

National Model Design Code

Ministry of Housing Communities and Local Government guidance on the production of design codes, guides and policies to promote successful design.

Net zero carbon

The amount of carbon added to the atmosphere is no more than the amount removed.

Passivhaus

Rigorous whole building standard for energy efficiency in buildings.

Plot ratio

The ratio between the amount of internal floor space of a building and the site area.

Shared Carriageway

Where cyclists and motor vehicles share the road.

Slender appearance

The appearance of a small width in proportion to height.

SMART Infrastructure

Connected infrastructure which gathers data for performance improvement.

Street Ratio

The ratio of street height to width.

SuDS

Sustainable drainage systems.

Supplementary Planning Document

A document to provide more detailed advice or guidance on policies in an adopted local plan.

Urban Greening Factor

A planning tool to improve the provision of Green Infrastructure particularly in urban areas.

Vision and validate

An approach to assessing transport need which focuses on active and sustainable travel.

WELL Building standard










A standard to measure, certify and monitor features of the built environment that impact human health and well-being.

6.2 Regulating plan, A3






The regulating plan describes the specific spatial requirements of the Code within the Water Lane area. It can be used to help identify which spatial Codes are relevant to an individual planning application.

Legend

Welcoming neighbourhoods

-  **Neighbourhood Centre**
W03
-  **Residential led development**
Multiple codes apply
-  **Water Spaces**
W10-12
-  **Primary school**
W04, Preferred location
-  **Employment opportunity area** W07
-  **Boat storage**
W05, Preferred location
-  **Craning point**
W05, Fixed location
-  **Solar farm, biogas plant and green waste**
Q09, W08 Fixed location
-  **Car parking for leisure hub**
W12, Fixed location















Liveable buildings

-  **Northern canal zone**
L04-05
-  **Canal basin zone**
L06-07
-  **Central zone**
L08-09
-  **Central zone water lane** L10-11
-  **Southern zone**
L12-13

For height requirements refer to L03 building heights coding plan.

For density requirements refer to L01 building density coding plan.





Active streets

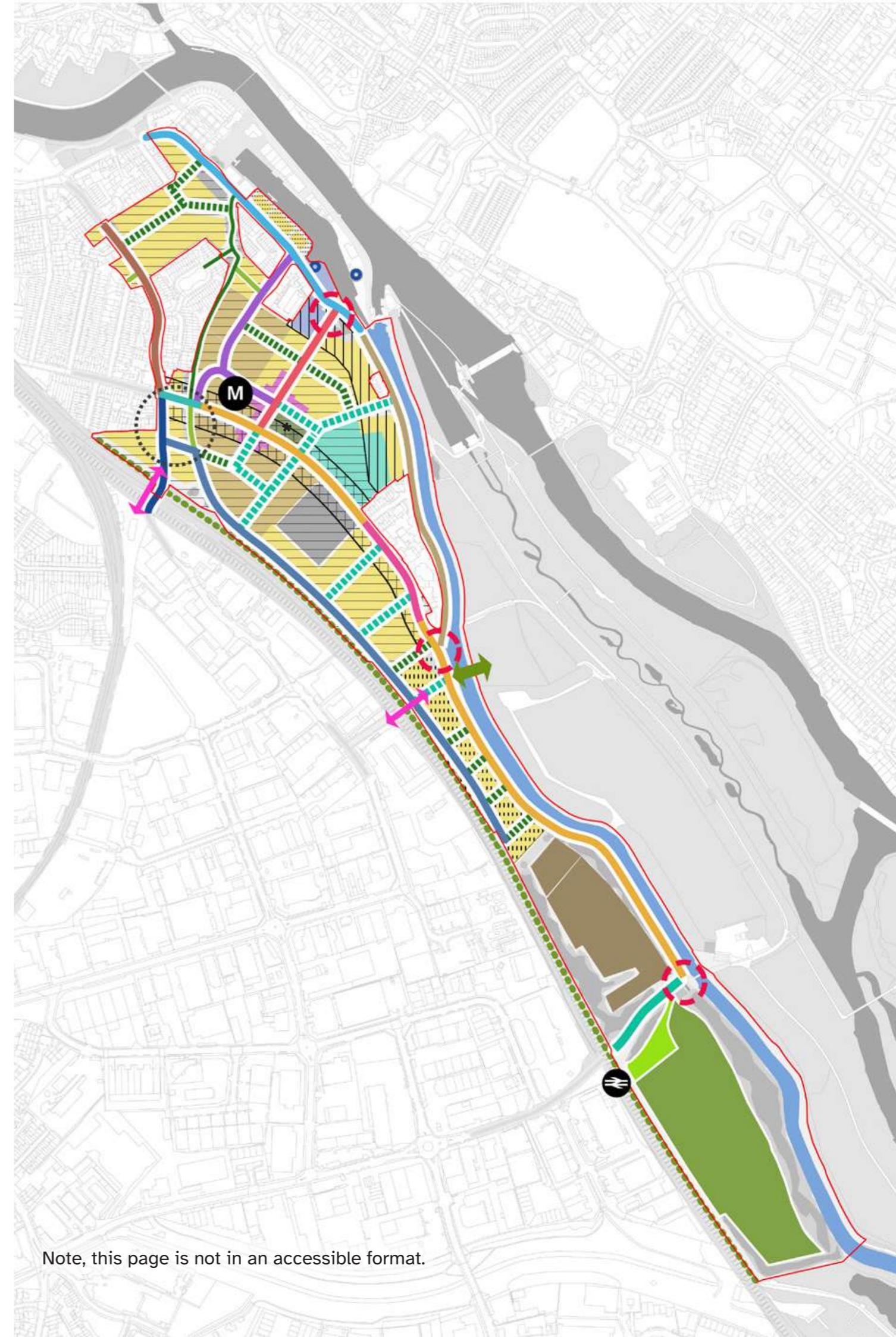
-  **Water Lane zone 1**
A12-14, fixed location
-  **Water Lane zone 2**
A12-14, fixed location
-  **Water Lane zone 3**
A12,14, fixed location
-  **Water Lane zone 4**
A12,14, fixed location
-  **Neighbourhood Street**
A15, Fixed location
-  **Foundry Lane**
A17, Fixed location
-  **Haven Road**
A16, Fixed location
-  **Michael Browning Way**
A19, Fixed location
-  **Tan Lane**
A18, Fixed location
-  **Green Streets**
A21, Indicative location
-  **Green Lanes**
A22, Indicative location
-  **Canal path**
A24, Fixed location
-  **New canal bridge**
A23, Indicative location
-  **Railway underpass**
A25

 **Primary mobility hub**
A06

 **Northern site access**
A20

Spaces for people and wildlife

-  **Local green space**
S12
-  **Grace Road fields**
S15
-  **Canal**
S13
-  **Railway embankment**
S14



Note, this page is not in an accessible format.

6.3 Constraints and opportunities plan

This plan shows most of the spatially located constraints and opportunities that were known during the preparation of the Code. It is expected that there will be further constraints identified, such as details of land contamination, through planning applications processes. A legend for the plan is provided on the following page.





























Flooding

Flooding is a significant constraints and has been central to the preparation of the Code. Note that the floodmap shown on the constraints and opportunities plan is currently being updated by the Environment Agency. The following key input from the Environment Agency has informed the Code:

- The majority of the Water Lane area lies in floodzone 3.
- Levels vary across the site which influences whether residential and other vulnerable users may or may not be acceptable on the ground floor.
- All dwellings need to have safe access and egress via a publicly accessible dry route.
- Water Lane (the Street) is an important flood flow route and its capacity needs to be safeguarded.



Constraints and opportunities plan legend

	Code boundary		Overhead powerline
	River & Canal		Pylon
	Riverside Valley Park		Underground power
	Railway and station		Power substation
	Existing trees (approximate size and location)		Electricity substation
	Vehicle dominated roads		Gas pipeline
	Narrow path		Gas 6m easement
	Existing bridge		Gas constraint zone
	Existing underpass		Energy generation
	Wider view		Sewer water
	Glimpse view		Level change
	Solar farm		Strategic waste facility
	Green corridor		Floodzone 3
	Consultation zone for strategic waste facility		Floodzone 2

6.4 National Model Design Code Topic map

The following list can be used to identify where specific topics within the National Model Design Code (NMDC) are covered within the Water Lane Design Code. Where the Code requirements cover several topics within the NMDC, the requirement has been listed once under the principle topic covered.

National Model Design Code

Water Lane Design Code

Context

C.1 – Character Studies

M01 – Contextual analysis

M03 – Character and cultural identity

M05 – Key views

C.2 – Cultural Heritage

M06 – Historic and existing features

Movement

M.1 – A connected network

A01 – Mobility strategy

A02 – Mobility strategy plan

A04 – Public transport

A20 – Northern site access

M.2 – Active Travel

A03 – General requirements for design of streets and junctions

A23 – Canal crossings

A24 – Canal tow path

A25 – Railway crossings

M.3 – Parking

A26 – Off-site connectivity and improvements

A05 – Primary mobility hub

A06 – Primary mobility hub functions

A07 – Secondary and tertiary mobility hubs

A08 – Car parking

A09 – Cycle and mobility parking

W09 – Utilities

National Model Design Code

Water Lane Design Code

Nature

N.1 – Green Infrastructure

S01 – Green infrastructure plan
S02 – Open space
S03 – Green and blue infrastructure
S05 – Urban Greening Factor
S09 – Play
S10 – Food growing
S12 – The community green space
S13 – Canal
S14 – Railway embankment
S15 – Grace Road Fields

N.2 – Water and drainage

Q18 – Flood risk
A10 – Safe access and egress
S06 – Sustainable Drainage Systems

N.3 – Biodiversity

S04 – Biodiversity
S07 – Trees
S08 – Planting

Built Form

B.1 – Compact Development

L01 – Building density

B.2 – Built Form

L03 – Building heights
L04 – Northern canal, height and massing
L05 – Northern canal, frontage
L06 – Canal basin, height and massing
L07 – Canal basin, frontage
L08 – Central zone, height and massing
L09 – Central zone, frontages
L10 – Central zone, Water Lane frontages and building line
L11 – Central zone, Water Lane height

National Model Design Code

Water Lane Design Code

L12 - Southern zone, height and massing
L13 - Southern zone, frontage
L17 - Relationship with existing buildings

Identity

I.1 - A sense of place

M04 - Relationship with the River and Canal
C01 - Culture led development

I.2 - The identity of buildings

Guidance on the design of buildings based on local character is provided within the Liveable buildings chapter, within the built form zones L04-L13

Public Space

P.1 - Streets

L02 - Street Ratio
A11 - Mobility coding plan
A12 - Water Lane, role and function
A13 - Water Lane, managing level change
A14 - Water Lane, access and movement
A15 - Neighbourhood Street
A16 - Haven Road/Maritime Court
A17 - Foundry Lane
A18 - Tan Lane
A19 - Michael Browning Way

P.2 - Social Interaction

A21 - Green Streets
A22 - Green Lanes
C03 - Public realm placemaking

National Model Design Code

P.3 – Security and public spaces

Water Lane Design Code

Guidance on security within the public realm is provided within the following sections.

- Regarding private spaces, ownership and activity within the Liveable Buildings chapter under L22-24.
- Regarding management and maintenance under Q13 Stewardship and governance.
- Regarding lighting, safe routes, surveillance, and management and maintenance of public spaces under S02 - Open space.

Use

U.1 – Variety and Activity

W01 – General land use and activity
W02 – Land use plan
W05 – Water related uses
W07 – Employment opportunities
W08 – Existing uses
W10 – Gas Works Place
W11 – Gabriel's Wharf
W12 – Clapperbrook Hub
L22 – Raised ground floors
L23 – Public, private thresholds
L24 – Non-residential ground floors
C02 – Creative industries
C05 – City culture hub

U.2 – Housing Mix

W06 – Housing mix

U.3 – Community

W03 – Neighbourhood Centre
W04 – Primary school

National Model Design Code

Homes and Buildings

H.1 – Housing Quality

H.2 – Health and wellbeing

Resources

R.1 – Energy

R.2 – Sustainable Construction

Water Lane Design Code

L14 - Housing size

L19 - Accessible homes

L20 - Flexible homes

L21 - Storage

S11 – Residential open space

L15 - Daylight

L16 - Ventilation and dual aspect

L18 - Noise

Q02 – Zero Carbon

Q03 – Site analysis and community engagement

Q04 – Energy hierarchy

Q05 – Passive and climate responsive design

Q06 – Local clean energy networks

Q07 – SMART grid and infrastructure

Q08 – Renewable energy

Q09 – Air quality and pollution

Q11 – Materials and waste hierarchy

Q01 - Global city qualities

Q10 – Water hierarchy

Q12 – Embodied carbon

Q13 – Resilience

Q14 – Building performance standards

National Model Design Code

Lifespan

L.1 - Stewardship

Water Lane Design Code

M02 - Local engagement

Q16 - Stewardship and governance

Q17 - Development coordination

6.5 Engagement summary

Purpose

To date, the Water Lane Supplementary Planning Document (the SPD) has been developed with input from the community and stakeholders through multiple engagement methods. The purpose of the engagement has been to:

- Enable positive collaboration with landowners, developers, community groups, residents, local businesses, the local authorities and other stakeholders to help shape the Code from the outset.
- Get meaningful input from a broad range of perspectives early in the process and ahead of formal consultation on the SPD.
- Enable the community and stakeholders to be engaged in the future of Water Lane and become custodians of the Vision.
- As far as possible, align stakeholders and the SPD to help accelerate subsequent planning decisions and delivery.

Exeter City Council will undertake formal public consultation on the SPD during the autumn of 2023, alongside consultation on the Full Draft Exeter Plan. The consultation will be carried out in accordance with statutory requirements and the City Council's Consultation Charter and Statement of Community Involvement.

Stakeholder engagement

The stakeholder engagement is an ongoing process which started in May 2023. It has involved initial engagement to gather early input before drafting the SPD and, later in the process, engagement to test and confirm specific code requirements. The list of stakeholders engaged to date include:

- Landowner/developer teams for sites across Water Lane.
- Exeter City Council officers.
- Exeter City Council members: Planning Member Working Group, Ward Members and Members of the Quay and Canal Trust.
- Devon County Council officers.
- Devon County Council members for water and the immediately adjoining area.
- Other public bodies including the Environment Agency, Homes England and National Grid.
- Key institutions including Exeter College, University of Exeter and the RDUH Hospital.

Early community engagement

Prior to the work on the SPD, a large number of community groups, ward members, local residents and local businesses came together in a series of engagement events and produced a 'Prospectus for the redevelopment of the wider Water Lane area'. The work was led by Exeter Civic Society. The Prospectus provided a starting point of early community engagement on the SPD, as it helped to establish an in-depth understanding of local people's priorities.

Early engagement with the local community took place between May and July 2023. The strategy for community engagement has utilised multiple channels and methods to get the best possible reach and meaningful input within the timeframe of the SPD program.

Citizens' Panel

A Citizens' Panel was set up to enable people with different perspectives to input and help shape the SPD from an early stage. This panel was key in complementing the technical and specific input from formal stakeholders and developer teams. Engagement with the Citizens' Panel took the form of workshops and a separate drop-in session to capture a broad range of views and allow differing levels of engagement.

The Citizens' Panel conversations were based on the questions and direction:

- What type of place do you want Water Lane to be in the future?
- What is important to you and special about the Water Lane area now, and what you think will be important in the future?

Details of the workshops and the drop-in session and the input gathered from the Citizens' Panel are summarised on the following pages.

Workshops

A long list of community organisations and representatives from the local community were invited to join the Citizens' Panel workshops. A small group of people were able to join these workshops. Other people who expressed interest in the Citizens' Panel but were not able to commit to the workshop timings were invited to the drop-in session as well as notified of the future formal public consultation. The workshops were spaced one week apart to maintain momentum whilst allowing participants to reflect between sessions.

Workshop 1:

The first workshop took place on the 19th June 2023 outside in the Riverside Valley Park directly adjacent to Water Lane. The outdoor location was chosen to enable a focus on the strong relationship with the place and give focus on the strong relationship between Water Lane, the Canal and the River. The focused theme of the workshop was "The essence of Water Lane" and activities included:

- An opportunity for Panel members to explain their interest in joining the Panel.
- An introduction to the purpose and process of preparing the SPD, followed by questions by participants.
- Capturing a collective essence of Water Lane and the adjacent Canal and River through collecting items from the area.
- Exploring participants' aspirations for Water Lane and their priorities for the SPD.
- Discussion on what the next workshop should include.
- Homework for next session: to write a short poem about your wishes for Water Lane.

Workshop 2:

The second workshop took place on the 26th June 2023, the first part at Exeter Canoe Club on Haven Road and the second part as a site walk through the Water Lane area. The focused themes of the workshop were “A true waterside community”, “Social infrastructure” and “Fostering a living community” and activities included:

- An introduction to the focused themes.
- An introduction to potential topics for the SPD and an example of an existing Design Code, following a request from participants at the first workshop.
- Key opportunities and challenges to discuss at workshops 2 and 3, based on the key topics in the Civic Society’s Prospectus.
- Site walk along the Canal discussing the focused themes.
- An exercise visioning Water Lane in 2040.
- Homework: to discuss with a young person what they would like Water Lane to be in the future.

Workshop 3:

The third workshop took place on the 4th July 2023 at Exeter Canoe Club. A site walk was planned but cancelled due to heavy rain. Instead, the discussion took place inside the Canoe Club with large scale maps to identify particular places. The focussed themes for the workshop were “Access and movement”, Character and architecture” and “Nature, water and energy” and activities included:

- Conversation around homework from previous workshops.
- Scene setting for the focussed themes, with an introduction to Net Zero carbon and transport as national/global drivers for change.
- Discussion of the focussed themes using post-it notes using post-it notes, maps and pens for marking maps.

Drop-in session

This session took place on the 12th July 2023 between 12 and 7:30pm. A long list of community organisations and representatives from the local community were invited to book a 30 min slot for a 1-1 conversation with a person from the SPD consultant team. 15 people attended this drop-in session including local residents and people from local community groups and businesses.

Input from the Citizen’s Panel

The input from the Citizen’s Panel helped shape the drafting of the SPD during July and August. The Panel has had a particularly strong influence on the Vision for Water Lane as well as helping to identify what is needed to achieve a true waterside community. Key inputs from the Panel have been categorised and are set out on the following pages. Some input has not been incorporated in the SPD for various reasons e.g. where there have been conflicting aspirations, conflicts with policy or aspects that are beyond the scope of the SPD.



Workshop 1: Participants collecting items from the area to describe the essence of the place.



Workshop 2 site walk: Participants sharing what's important to them within the area.

Input from the Citizens' Panel

We want this place to be a trail blazer, a flagship neighbourhood, a progressive example of waterside living

It would be wonderful if it was beautiful, not just people crammed in to maximise profits

Streets with considerate views of Canal, green space gaps, natural wayfinding

Vision

Needs soul

Wellbeing, Passive heating, affordable housing, flourishing biodiversity, renewable energy on site, don't allow large areas of concrete

A positive forward looking example of waterside living that shows what can be done and inspires other places

Citizen's Panel input relating to the Vision for Water Lane

Input from the Citizens' Panel

Character

- Waterscape as a defining feature of place
- Retain suburban feel - light, spacious and attractive
- If we're not careful we will destroy the Quay and waterfront, one of the primary reasons people live here
- I don't feel like we live in the city - live in the Valley Park in nature
- View of Haldon, lit up like a lighthouse
- Industrial heritage integrated into site
- Views of St Leonard's Church spire
- Shaping one of the key areas of the city
- Retain the feel of paddling along a lovely canal in nature
- People are here for contact with nature, space, water access
- I don't want to feel trapped between the Canal and a block of flats
- Maritime past is the golden thread between life, character and commerce
- Different clusters with different characters
- Most people have lived here for a long time
- Crane should be preserved
- Part of a continuum of heritage buildings and industrial history of Exeter
- A legacy for generations to come
- Gas works has to be retained
- Things are being built quickly with little consideration
- Not keen on uniformity of proposed
- Protect existing heritage

Water

- We want a clean Canal and a clean River
- Sea Scouts worried about swallowing sewage
- Water bills are the highest bill here - we use a lot of water to clean our canoes - it would be great if we could use harvested rainwater for this
- Potential for wetland restoration
- As Canal is a defining place feature, it should be included in site boundary for Design Code
- Not just for yuppies drinking fine wine by the water, we want to see more activities and enjoyment of the water
- Lots of dead fish
- Where can we invite the soft edges in? Bird families nestle in the soft sides of the Canal not the hard manicured side
- If the weir fails, there is no water in the Canal. One has already failed
- Make space for water
- Flood risk is important
- We're short of water. How will the development improve water supply?
- What does the River and wildlife need from us?
- Need better access to the water for children and families
- Return to tidal estuary
- Return of Salmon in their numbers and celebration
- Making a wetland filtered lido for clean, safe swimming, with community saunas
- We need a new slipway - the existing one isn't useable
- We need to retain craning points for large ships
- In the future I'm imagining the Canal busy with water taxis and boats delivering fresh fish for sale.
- Enable more heritage ships to come into Exeter
- Scared of a privatised waterfront

Nature

- Seating surrounded by nature and wild gardens
- Don't want it to look too hard, it should blend with nature
- Concerned proposals will spoil wildlife
- A really great environmental landscaping opportunity
- Put things in soil not planters
- BNG is an opportunity for development to be green
- Waterside needs public space so you don't feel you're sitting in someone's private area
- Want to be able to see the trees and hills
- Preserve owls, bats, trees already there
- Green buffers between buildings and Canal

Resilience

- Quality = should last longer than 100 years
- Heat risk is crucial with extended heat waves. How will buildings handle this?
- Food resilience - use available space for growing
- Refurbish not demolish
- Everything should balance the carbon emissions
- How do we prepare for future pandemics?
- Charitable sector is important to city resilience, heading into a state of permanent crisis, can't afford commercial rates on space
- Needs a charitable sector strategy to amplify social impact
- Ride On cycle hub needs: minimum 400 sqm for workshop, storage, testing bikes
- Focus on adaption and mitigation

Leisure and tourism

- A regional destination, not just a housing estate
- An urban campsite at Grace Road Playing Fields by Marsh Barton station would be a great attraction
- Currently difficult for visiting boaters to come to Exeter
- A little wilderness playground by the city
- A place for rowing regatta with parking
- Give space to sea cadets/scouts/outdoor education
- Access to water activities and leisure facilities like climbing

Gabriel's Wharf

- The operational bones of the harbour
- A space to break up and maintain ships
- It's the only space for larger ships and strong crane. Weight is the limiting factor
- Provides parallel access to slip way for launching visiting boats plus road access
- Opportunity site for small boat builders and maintenance
- It's the only space for larger ships and strong crane. Weight is the limiting factor
- Potential to be a busy active location
- What's the positive picture of light industry and living along side it?
- No space left in the basin by Quay
- Think about boat storage, access, boat builder economy

Mobility

- Like it to be a traffic free area
- Build the houses around the cycle lanes
- People travel differently when in a dense urban area
- Most people I know here cycle to work
- Lots of conflict on shared paths: need to separate fast commuters from others
- Two different transport problems here. Short distance travel for residents and then visitors. Need links to park and ride/change
- River path
- Need secure place to put bikes
- Design the car out. Give choices. Show people it can be done, communicate examples
- Space for children to run around - currently car priority
- Free cycles for residents?
- Paths should be improved up front
- Paths and crossings over Canal and River too narrow
- A lot of people use Michael Browning Way for turning
- Traffic detracts from tranquility
- Lack of car parking is a problem. You need to have a car to access Devon
- Accessibility for all people young and old
- Needs space for trailer with minibus to access waters edge
- Only one road in and out - needs another
- A lot of deliveries need to be managed
- Cars use the pavement as a second lane on Haven Road
- Alphington Road is horrible. Access down Tan Lane would help
- Important that there is car parking for people wanting to access Haven Banks and get onto the water - it's a regional destination and many people from Devon can only come by car.

Infrastructure

- Needs cafes and event space
- Seating and social spaces
- Primary school
- Start with investing in walking/cycling routes
- Infrastructure in place ready for houses
- Existing buildings could become club houses / for socially minded organisations
- Local GP and dentists all filled up
- Local food shop with local produce
- Local recycling hub
- Social facilities on the water

Height and density

- Existing house heights need to be taken into account
- Height can be higher in the centre of the site and dropping in height towards the River
- Buildings shouldn't be closer than 40 yards from the water
- Height is my biggest concern
- 5-6 stories high would be okay
- Apartments mean more emphasis on public spaces
- A 12 storey building that looks great would be fine
- Put dense parts near Marsh Barton station, low buildings at the front of the development, higher buildings hidden with trees tucked into the site, where adjacent to existing residential buildings should not be more than one or two stories higher
- Not against apartments and density, but needs to be done respectfully
- My house is currently dark in daylight and I am worried I will get impacted

Community

- Don't sacrifice the City's qualities for developer profits
- Allotments where people can come together
- Cotfield Street is family orientated
- A lot more exciting if it was family friendly homes
- Avoid privatisation of development like Haven Banks and Piazza Terracina
- We have people living on boats and vans in this community, how do we include not exclude our own community members?
- Should be young people friendly, involving truly affordable accommodation for 1 or 2 bed houses
- Development doesn't have to mean gentrification
- Better social housing proposals
- No transient populations: co-living/student - no regard for residents. Minimum tenancy?
- Children short changed by car priorities
- Rent controls

Stewardship

- How to invite future residents as custodians?
- Needs an explicit maintenance plan
- The management of the Canal path is not done properly
- Members of public to have a say in Section 106 spend

Young people

- Need accessible opportunities for youngsters to enjoy outdoor activities themselves at their own pace, remove the barriers to participate
- At the canoe club, the profile of youngsters has changed from lower class to middle class due to safety/bureaucracy/accessibility
- Canals are not a toy, not as safe as it looks. Can't get in/out easily. There is a drowning risk
- Cheap or free accessible water / adventure activities
- My children love the flood relief channel, see the seasonal realities of wildlife, swans protecting their young, they like being very close to the water, they climb on everything and want more informal/playable spaces. They try to run across the roads. Less traffic please
- My daughter is 17. Wants to hang out with friends, having nice public open space. Teenagers don't feel welcome anywhere. Where are they meant to go?
- Would love to be able to live on this site
- Daughter 11, cycle mad, animal lover, make sure the animals have somewhere to go, to grow food locally. School nearby so I don't have to sit in car traffic everyday
- My nephew is 17 doing his apprenticeship in Marsh Barton. He wants to keep a job in the city he grew up in, he's a proper home body, he'd love to live here if he could afford it

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 3 October 2023	Consultation on Liveable Water Lane: Development Framework and Design Code Supplementary Planning Document (Water Lane SPD)	That the Executive 1) Approves the Water Lane SPD (included in Appendix A) as the basis for public consultation commencing on 23 October 2023;	Race and Ethnicity; Disability; Religion and Belief; Age; and Pregnancy and Breastfeeding.

Committee name and date:	Report title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
		2) 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 Water Lane content before it is published for consultation; and 3) Gives delegated authority to the Director of City Development, in consultation with the Council Leader and Portfolio Holder for City Development, to agree a change to the consultation start date if required.	

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
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	Positive	Medium	The SPD does not include specific guidance on this characteristic. However it does make specific reference to cultural placemaking, and the need to ensure that all people living in Water Lane feel invested in their community and have a strong sense of belonging. This is coded for under M02, Local Engagement.
	Neutral	N/A	The previous experience of some groups (e.g. gypsies and travellers, migrant workers, asylum seekers) may mean they feel marginalised and excluded from the planning process including consultation. The consultation should be planned to ensure that all groups irrespective of race and ethnicity can access the consultation process. Digital and in-person methods should be used to support engagement.

Protected characteristic/ area of interest	Positive, neutral or negative impact	High, medium or low impact	Reason
<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>	Positive	Medium	<p>The SPD requires development at Water Lane to provide for the needs of people with disabilities. For example, it specifically refers to the need to provide car parking for blue badge holders (in an otherwise low-car development area), ensure that mobility hubs are easy to find and access, and to ensure that at least one of the active travel connections on Water Lane are accessible for all users. It also makes specific reference to the need to ensure that all people living in Water Lane feel invested in their community and have a strong sense of belonging. This is coded for under M02, Local Engagement.</p>
	Neutral	N/A	<p>The previous experience of some groups may mean that they feel marginalised and excluded from the planning process including consultation. The consultation should be planned to ensure that all groups irrespective of disability can engage in the consultation. Digital and in-person methods should be used to support</p>

Protected characteristic/ area of interest	Positive, neutral or negative impact	High, medium or low impact	Reason
			religious groups are able to contribute. Digital and in-person methods will support this engagement and thought should be given to ensure appropriate venues are used for events.
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral	N/A	The SPD does not include specific guidance on this characteristic and no impact is anticipated.
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	Medium	The SPD should have positive impacts for a broad range of age groups covered by this characteristic. For example, the SPD includes guidance on the need for development to include a mix of uses that cater for a broad demographic, including, residential (including a mix to cater for a broad demographic), workplaces, education, healthcare and community facilities. It also refers to the importance of accessibility for all in terms of public space and transport. Furthermore, it makes specific reference to the need to ensure that all people living in Water Lane feel invested in their community and have a strong sense of belonging. This is

Protected characteristic/ area of interest	Positive, neutral or negative impact	High, medium or low impact	Reason
	Neutral	N/A	<p>coded for under M02, Local Engagement.</p> <p>The consultation should be planned to ensure that all age groups are appropriately catered for. Digital activities often provide improved access for younger groups, but an over-emphasis can exclude older groups.</p>
<p>Pregnancy and maternity including new and breast feeding mothers</p>	Positive	Medium	<p>The SPD does not include specific guidance on this protected characteristic. However it does refer to the importance of accessibility for all in terms of public space and transport, identify healthcare and community facilities as suitable land uses at Water Lane, and support the provision of a range of employment opportunities including live-work units. It also makes specific reference to the need to ensure that all people living in Water Lane feel invested in their community and have a strong sense of belonging. This is coded for under M02, Local Engagement.</p>

Protected characteristic/ area of interest	Positive, neutral or negative impact	High, medium or low impact	Reason
	Neutral	N/A	The consultation should be planned to ensure that women who are pregnant or breast feeding are able to contribute. Digital and in-person methods will support this engagement and thought should be given to ensure appropriate venues are used for events
Marriage and civil partnership status	Neutral	N/A	The SPD does not include specific guidance on this characteristic and no impact is anticipated.

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

Consideration of a wide breadth of consultation methods to support the needs of groups with protected characteristics.

Officer: Katharine Smith, Principal Project Manager - Local Plan

Date: 05.09.2023

REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

Report of: Director of City Development

Title: Householder's Guide to Extension Design Supplementary Planning Document (SPD)

Is this a Key Decision?

Yes

Is this an Executive or Council Function?

Executive

1. What is the report about?

This report sets out the details of a review and update on the Council's Householder's Guide to Extension Design Supplementary Planning Document (SPD), and seeks approval to consult on the document for 6 weeks in October 2023.

2. Recommendations:

2.1 That the Executive approves the 'Householder's Guide: Design of Extensions and Alterations' (included in Appendix A) as the basis for public consultation commencing on 23 October 2023;

2.2 That the Executive gives delegated authority to the Director of City Development in consultation with the Portfolio Holder for City Development to agree minor changes to the 'Householder's Guide: Design of Extensions and Alterations' before it is published for consultation; and

2.3 That the Executive gives delegated authority to the Director of City Development in consultation with the Portfolio Holder for City Development to agree a change to the consultation start or end date if required.

3. Reasons for the recommendation:

As part of the City's Local Development Scheme it was identified that the Council's well established and used SPD for householders on extension design had not been updated since 2008, and so did not reflect changes that have been made to policy, nationally and locally, including the adoption of the Council's Residential Design Guide. In this case an update will ensure the SPD aligns with current planning policy and guidance.

As the local planning authority for Exeter, the Council has a statutory duty to consult on the draft revised SPD before it can be adopted. This consultation will enable the wider community to inform changes to the document as it evolves toward the final version, fulfilling statutory requirements and to ensure it is in accordance with the Council's Statement of Community Involvement (SCI) adopted in July 2022 and Consultation Charter adopted in July 2021.

4. What are the resource implications including non financial resources

The work in updating the document has been carried out by the Planning team in City Development, without the need for additional consultancy work, as a result there are no budget implications.

5. Section 151 Officer comments:

There are no additional financial implications for Council to consider arising from this report.

6. What are the legal aspects?

The Planning and Compulsory Purchase Act 2004 established a system of local development planning in England. The Town and Country Planning (Local Planning) (England) Regulations 2012 (SI 2012/767) (the “Regulations”) make provision for the operation of that system. The legal process for preparing and consulting on SPDs is set out in Part 5 of the Regulations. This includes a requirement for SPDs to be consulted on for a period of not less than four weeks. The Council will need to ensure that the Regulations are adhered to in the consultation process.

The Regulations include a requirement as part of any later subsequent adoption process to prepare an adoption statement setting out who has been consulted, a summary of the main issues raised and how those issues have been addressed in the SPD (Regulation 14).

7. Monitoring Officer’s comments:

Members’ attention is drawn to the legal aspects set out in paragraph 6 above. Otherwise this report raises no issues of concern to the monitoring officer.

8. Report details:

Background

A review and update has been carried out of an existing Supplementary Planning Document (SPD) published in 2008, which provides advice for householders submitting planning applications for extensions and alterations to their properties. This has been needed as there have been changes to: - adopted and emerging local plan policy; the National Planning Policy Framework and Planning Practice Guidance; permitted development rights that affect householders and the Council’s Residential Design SPD has subsequently been published.

A public consultation on the document is proposed between the 23rd October and 4th December 2023. The intention is to adopt the document by June 2024.

Comments

Householders’ planning applications make up around 20 to 30 per cent of the total dealt with by City Development. The existing ‘Householder’s Guide to Extension Design’ SPD sets out a clear set of principles that guide homeowners to help ensure their planning applications for extensions and alterations succeed. This is based on design policies DG1

and DG4 of the adopted Local Plan First Review. The document cover themes including local distinctiveness, the design of homes, outbuildings and function of gardens, amongst others. Over the last 15 years this has helped to protect the living conditions of those living adjacent to householder developments whilst ensuring the special character of the city is maintained.

The updated document seeks to achieve the same aims, whilst reflecting changes in local and national policy, and the Council's Residential Design Guide. Key changes include, further consideration of gardens and boundary treatments, refinements on the advice on building design, with supplementary advice on the addition of roof lights and solar panels to properties.

It is proposed that the title is changed to the following - Householder's Guide: Design of Extensions and Alterations

Public Consultation

To comply with relevant legislation, it will be necessary to publicly consult on proposals to revise the SPD for a minimum period of 4 weeks. In this case it is it is proposed that the document will go out to public consultation for 6 weeks from 23rd October until 4th December 2023.

The consultation will run alongside that proposed for the Exeter Plan and the Water Lane Design Code SPD. The consultation will accord with the Council's adopted Statement of Community Involvement and Consultation Charter.

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

The SPD consultation, followed by its adoption, will be important in ensuring the delivery of objectives in the Council's Corporate Plan. Specifically: - 'building great neighbourhoods', helping deliver a 'Net zero carbon city' and deliver a 'thriving Culture and Heritage'. It will achieve this by ensuring residents can improve their homes in a way that protects the living conditions of their neighbours whilst creating an attractive place to live; provide advice and guidance on the addition of solar panels to properties to help reduce energy use and provide guidance on protecting features of historic value.

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

That the proposed changes are not endorsed through the consultation process. Risks are reduced as it is considered that the proposed changes are relatively minor or necessary due to policy or legislation changes. There will also be an option to make revisions following the consultation process.

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: See attached Equalities Impact Assessment.

12. Carbon Footprint (Environmental) Implications:

There are no direct carbon/environmental impacts arising from the recommendation to hold public consultation on the revised draft Direction and SPD. However, digital consultation methods will minimise the carbon footprint of the consultation.

13. Are there any other options?

The document could remain unchanged, but this would not reflect the most recent policy and government guidance so could result in confusion and weaken the status of the document as part of the decision making process for householder applications.

Director of City Development, Ian Collinson

Author: Hayley Stokes, Assistant Service Lead (DM)

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

Background papers used in compiling this report:-

None

Contact for enquires:
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Room 4.36
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Householder's Guide: Design of Extensions and Alterations

Supplementary Planning Document



Consultation draft
October 2023

Householder's Guide: Design of Extensions and Alterations Supplementary Planning Document

Consultation Draft

October 2023

** Front cover images: Exeter has a rich and varied palette of existing materials and construction techniques that create a distinctive character and help to establish a strong sense of place*

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1. Introduction

- 1.1 Householders' planning applications make up around 20 to 30 per cent of the total dealt with by the City Development team at Exeter City Council. Our planning officers have a responsibility to ensure that proposals do not harm the living conditions of neighbours and that through good design, they have a positive impact on Exeter's environment and its streetscapes.
- 1.2 This guide sets out in a clear and structured way the principles that will enable your planning application for changes to your house to be approved. It is also a valuable tool to ensure design quality in the city.
- 1.3 This document is principally designed for applicants submitting planning applications. If you are applying for Listed Building Consent (LBC), which is required when making internal and external alterations to a listed building, we recommend you seek further advice from the City Development team.

Permitted development

- 1.4 'Permitted development rights' enable certain extensions, alterations, and outbuildings to be constructed without planning permission. The [Planning Portal](#) website provides a wealth of information including an interactive tool that gives clear guidance on what you can do to your house without the need for planning permission, it also sets out the limitations of this.
- 1.5 Not all dwellings have permitted development rights. It is important that this is checked and understood when you are intending to make alterations to your house, to ensure the works are lawful. Flats do not benefit from permitted development rights. Whether your house has permitted development rights will depend on the history of the building, its location and whether it is listed. In some parts of Exeter, the permitted development rights have been removed or restricted to protect the local character.
- 1.6 For further information, visit: [Do I need planning permission? - Exeter City Council](#).

Pre-application advice

- 1.7 Exeter City Council offers a pre-application advice service to householders considering an extension or alterations to their property or a property not yet owned. The aim is to allow planning officers to identify any problems in advance and suggest changes to increase the likelihood of planning approval.
- 1.8 For further information and to submit a pre-application enquiry online, visit: [Planning pre-app advice - Exeter City Council](#).

Building Regulations

- 1.9 Irrespective of whether or not you require planning permission, you may need separate Building Regulation approval. We advise early contact with Exeter City Council Building Control to establish likely requirements, costs and timescales.
- 1.10 For further information, visit [Building regulation approval - Exeter City Council](#).

External works

- 1.11 External works such as pergolas, decking, patios, boundary walls or fences often require planning permission. Please use the [Planning Portal interactive tool](#) as a guide to determine if planning permission is required. Or refer to the Planning Portal's common project guide to find out more about your proposed project: [Common projects - Planning Portal](#)
- 1.12 It is considered that boundaries, such as fences and walls, should be carefully designed to contribute to the local distinctiveness of the area. See Section 8 for further advice on boundaries.

Sustainability

- 1.13 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 to be net-zero carbon by 2030.
- 1.14 Building an extension is an opportunity to improve your home's environmental impact. We will give merit to proposals that enhance environmental performance.
- 1.15 For information on home energy generation and common micro-renewable energy projects such as solar and photovoltaic panels, micro-wind turbines, heat pumps and biomass technology, visit the [Planning Portal](#).
- 1.16 The Energy Saving Trust can provide further information about ways to reduce energy use at home: [Energy advice for your home - Energy Saving Trust](#).

Crime prevention

- 1.17 It is essential to consider the impact that your proposal may have on the security of the original house and the neighbouring properties at an early stage. Security measures should be unobtrusive and designed as an integral part of the overall proposal. Opportunities to break in, such as drainpipes and flat roofs providing easy access to first-floor windows, should be avoided. Front doors should be visible from the street to prevent potential intruders from being hidden from view. Good natural surveillance from within the property should also be provided.
- 1.18 Security advice can be sought from Devon and Cornwall Constabulary. For further information visit: [Protecting your home from crime | Crime prevention | Devon & Cornwall Police \(devon-cornwall.police.uk\)](#)

Planning applications

- 1.19 Planning applications are made by submitting forms, specific plans and annotated drawings drawn to scale, any other supporting information and documentation necessary to process the application. The requirements to ensure that an application is valid can be found here: [Apply for planning permission and other consents - Exeter City Council](#).

- 1.20 When submitting a planning application, in most cases there will be a fee to be paid. A missing or incorrect fee will delay the processing of your application. The Planning Portal keeps an up to date list of fees and provides a fee calculator tool: [What it costs - How to apply - Planning Portal](#).
- 1.21 **Consulting neighbours:** Applicants are advised to talk to neighbours to explain their proposals before submitting a planning application. Consulting neighbours at an early stage can ease the formal consultation process that will follow and therefore save time and expense later on by avoiding the need for plans to be revised.
- 1.22 **Changing proposals:** A new application is likely to be required for changes to an approved design if it will result in different dimensions, external appearance or materials. Please submit revised plans to us and we can advise if the changes would be considered a 'non-material amendment' or require a new planning application.

2. Policy Context

- 2.1 This guide is one of a series of Supplementary Planning Documents (SPDs) that form part of the Local Development Framework of Exeter. This Householder's Guide to Extension Design and Alterations SPD amplifies Local Plan design guidance policies DG1 and DG4 (see below) and, together with the [National Planning Policy Framework](#), forms the basis for Exeter City Council's determination of planning applications.
- 2.2 Extensions, individually and cumulatively, can significantly impact townscape and living conditions for neighbours. No proposal is too small to have an impact, and Exeter City Council requires all applications to achieve high standards of design and living conditions. Applicants are advised to appoint an architect or other appropriately qualified professional to carry out the design work.
- 2.3 Many places and streets in Exeter are designated as 'conservation areas', where additional policy and legal protection exists to help conserve and enhance the character and appearance of these historic areas.
- 2.4 There are also a number of well-designed areas of housing within the city that have a strong, distinct character, which include designed open amenity areas and public spaces. Examples include the post war housing around Wonford including Burnthouse Lane and Rifford Road areas, and newer developments at Gras Lawn and Wyvern Barracks either side of Barrack Road. These unique characteristics should be protected, and further guidance is provided in this document.

Local Plan policies

DG1: Development should

- a) Be compatible with the urban structure of the city, connecting effectively with existing routes and spaces and putting people before traffic;
- b) Ensure that the pattern of street blocks, plots and their buildings (the grain of development) promotes the urban character of Exeter;
- c) Fully integrate landscape design into the proposal and ensure that schemes are integrated into the existing landscape of the city, including its three-dimensional shape, natural features and ecology;
- d) Be at a density that promotes Exeter's urban character and which supports urban services;
- e) Contribute to the provision of a compatible mix of uses that work together to create vital and viable places;
- f) Be of a height that is appropriate to the surrounding townscape and ensure that the height of constituent parts of buildings relate well to adjoining buildings, spaces and human scale;
- g) Ensure that the volume and shape (the massing) of structures relate well to the character and appearance of the adjoining buildings and the surrounding townscape;
- h) Ensure that all designs promote local distinctiveness and contribute positively to the visual richness and amenity of the townscape;
- i) Use materials that relate well to the palette of materials in the locality and reinforce local distinctiveness.

Local Plan policies

DG4: Residential development should:

- a) Be at the maximum feasible density taking into account site constraints and impact on the local area;
- b) Ensure a quality of amenity which allows residents to feel at ease within their homes and gardens;
- c) Ensure that the boundaries of private rear gardens facing public places are designed to make a positive contribution to the townscape;
- d) Where front gardens are included, provide enclosure to create defensible space.

3. General Principles

- 3.1 All extensions should follow the twelve General Principles and additional guidance in this section.
- 3.2 Further specific advice relating to particular types of extension can be found in separate chapters. Planning applications which follow the General Principle outlined in this document will generally be successful, and the time taken to achieve a consent will be minimised.

General Principles

1. Use

Extensions should not be designed or used as separate residential units or businesses.

2. Street scene

Extensions should respect existing building lines, the pattern of buildings in the street and the spaces between them. Extensions should not project forward of the front main building line, nor cause terracing* or contribute to creating terracing.

**Terracing refers to two-storey side extensions which result in an unacceptable reduction in width or total loss of the gap between properties - creating the impression of a continuous building frontage.*

3. Natural light and outlook

Extensions should not adversely affect the natural light and outlook enjoyed by neighbours.

4. Privacy

Extensions should be designed to minimise overlooking into neighbouring properties.

5. Scale and massing

Extensions should be subservient* to the original house and be carefully composed with sympathetic proportions.

**Subservience means that the size and proportion of an extension allows the main house to remain the dominant feature.*

6. Roofs

Roofs should match the main roof in terms of shape, pitch and materials. The ridges or the highest rooflines should be set lower, and the eaves-line should be no higher than that of the main roof.

7. Architectural details

Architectural details of the main building should be protected and repeated in the extension design.

8. Materials

Exterior materials, and the way they are used (e.g. coursing and pointing, jointing and fixing), should generally match the original house.

General Principles

9. Garden Space

Proposals should normally ensure that 55 square metres of private useable garden space* remain after construction. Where gardens are currently less than 55 square metres, an extension may not be permitted.

** 'Useable garden space' is land under the occupier's exclusive control within the dwellinghouse's curtilage. It only includes land that has been adequately screened, usually to the rear and side of the property, and excludes driveways. The minimum area is generally 55 square metres, please see Chapter 7 of the [Residential Design Guide SPD - Exeter City Council](#) for a full explanation of the requirements. The area may reduce for smaller dwellings but might need to increase for gardens with poor orientation.*

10. Integrated design

All elements of the proposal, including landscape works, bin and bicycle storage and security, should be considered and designed as part of the overall scheme from the outset.

11. Landscape

Extensions should be designed to minimise the impact upon existing soft and hard landscape features that positively contribute to local character, biodiversity and appearance e.g. mature planting, trees, and boundary treatments.

12. Security

The security of the extended and adjoining properties should not be prejudiced by the design of extensions. Security measures should not harm the established character of the street and the original house.

Site appraisal

- 3.3 This guide cannot cover every particular challenge, and each site is different. Therefore it is vital to appraise the site thoroughly to produce an appropriate design solution. Some sites may need specific solutions which do not comply with certain General Principles when responding to particular circumstances. **Where the site appraisal suggests a proposal that does not adhere to this guidance, a complete justification of the design approach will need to be provided in a design and access statement.**
- 3.4 Each application will be considered on its own merits. Existing extensions of poor quality should not be taken as precedents for new proposals.

Contemporary design

- 3.5 Exeter City Council does not wish to restrict high-quality creative designs and welcomes appropriate innovation. It will support contemporary design, provided that it fits in well with the street scene and responds well to all other planning considerations.
- 3.6 Where a contemporary design is proposed, an application should be accompanied by a design statement justifying the approach taken and explaining how the design, notwithstanding its contemporary approach, adheres to the General Principles outlined within this chapter.

Relation to site boundaries

- 3.7 No part of an extension, including rainwater goods, canopies and overhangs, should extend beyond site boundaries. If the extension overhangs, the works will no longer be a householder planning application, which is a simplified planning process. In this case applicants should seek prior agreement from the adjacent owner and a full planning application will be required.
- 3.8 Care should be taken when proposing an extension close to a neighbouring property to ensure that properties retain their independent form, and to provide adequate space for future maintenance of the extension including elements such as guttering and aerials.
- 3.9 There is potential for foundations to be built up to the boundary line but, depending upon the technical design of the foundation, the walls which they support might need to be constructed inset (as illustrated in Figure 3.1). Consider other possible technical constraints such as the strategy for rainwater disposal or surface water drainage, which may also need to be accommodated adjacent to the site boundary.

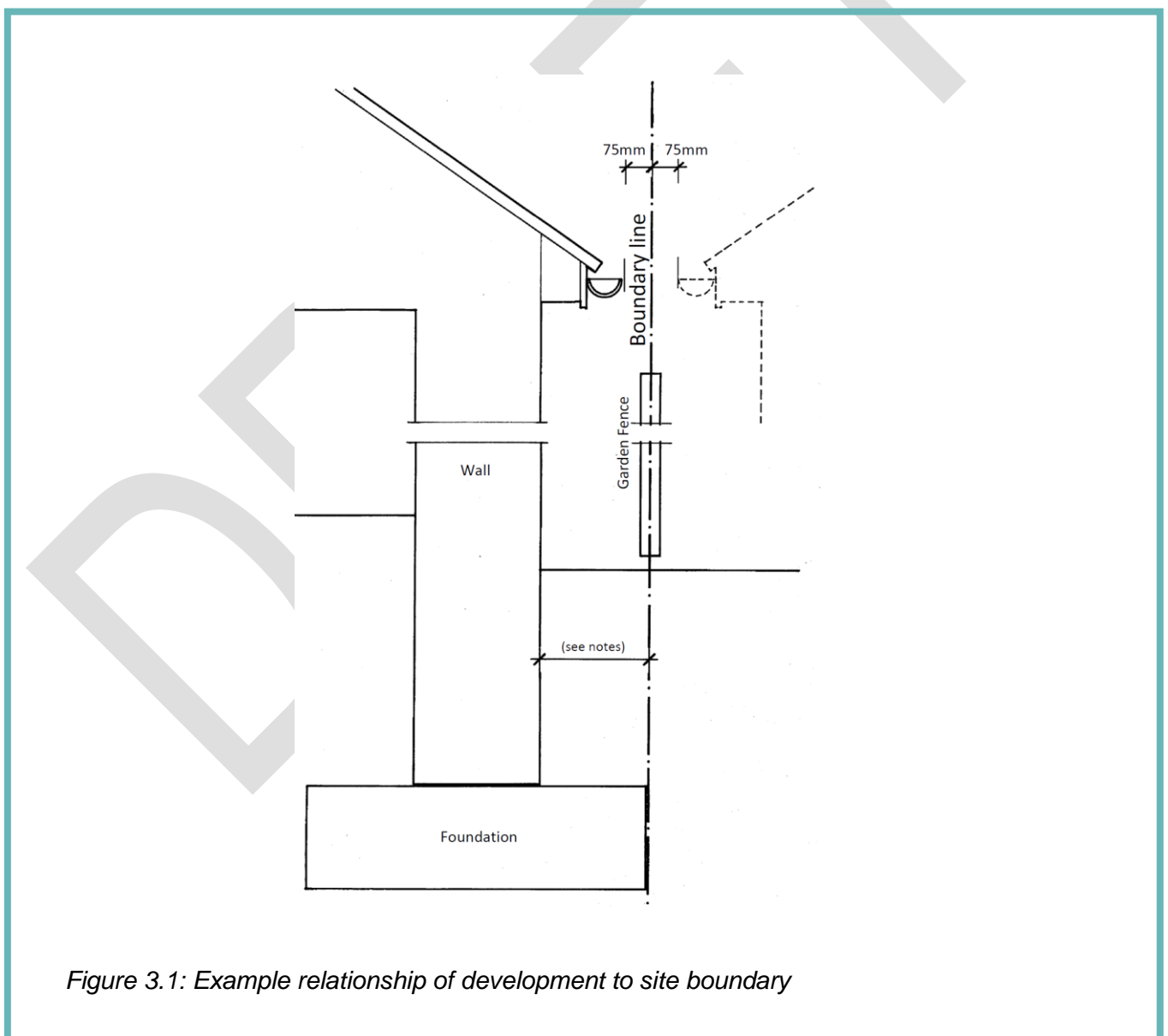


Figure 3.1: Example relationship of development to site boundary

Access, parking and servicing

- 3.10 An over intensification of the existing residential use through an extension or alteration, may result in an unacceptable deficit in the servicing requirements for the property contrary to Local Plan policy DG1. This may be in terms of car parking, storage space for cycles, refuse and recycling or even useable external space. This can also impinge on the overall function of the area, affect highway safety and diminish the attractiveness of the neighbourhood.
- 3.11 Garage conversions to habitable accommodation can require planning permission, please check the [Planning Portal](#) or discuss with the City Development Team if you are unsure whether your proposal needs permission. This type of development can result in the loss of a potential on-plot parking space, if this is the case and planning permission is required, Devon County Council as the local Highway Authority, would need to be consulted as part of the planning process to assess any resulting impact upon the surrounding roads.

Gardens

- 3.12 Gardens are an important characteristic of many parts of Exeter forming an intrinsic part of the identity of a particular locality or neighbourhood. They are important for the health and wellbeing of households. They add to the biodiversity, forming an extensive network of habitats and wildlife corridors throughout the city and their importance to the diversity and richness of urban landscapes is often overlooked. Gardens provide good sources of food for insects, and for birds. They may include nesting sites for birds, habitats for frogs, toads, slow-worms and hedgehogs, etc and also ponds, attract dragonflies and other aquatic and semi-aquatic insects. In the longer term gardens will be essential to help society adapt to the effects of climate change and allow for the growing of local food. They are therefore a resource to be protected for now and for the future.
- 3.13 Development affecting residential gardens should:
- Ensure that extension and alterations of homes will allow residents to feel at ease within their garden (Local Plan policy DG4 part b), and
 - Meet the standards for space and design as set in principle 9 of the General Principles, and within Chapter 7 of the [Residential Design Guide SPD - Exeter City Council](#).

Materials and detailed design

- 3.14 In order to support local distinctiveness and to harmonise with the existing property in line with the General Principles (Section 3), the materials used in an extension should usually match and correspond with those of the host building. This includes the use of string or dental courses, brick patterns and quoins as well as sills, lintels and copings. There are a multitude of different colours, textures and shades of bricks and external finishes and it is critical to the success of an extension to ensure new external walls match the existing as closely as possible. This will be an important factor within the application and if precise details of the materials proposed are not agreed prior to determination, they may be subject to a condition requiring a separate submission and an additional fee to discharge.
- 3.15 Other architectural details of the host building may be equally important and an extension should not harm or detract from these. Instead they should be protected and as appropriate repeated within the extension. Examples include projecting bays, chimneys and special types of window such as oriel or bay windows.
- 3.16 Where it is not possible to replicate the materials of the original building then a clear contrast may be preferable to an approximate match and for a recessed 'shadow gap' or other type of

constructional seam to be introduced between 'old' and 'new'. Sometimes glazing can act usefully in this way.

- 3.17 The openings in a building are key aspects of the design and visual appearance. It is essential that new doors and windows adhere to the character of the property and general area. Generally the size, positioning, proportion, shape and materials of existing windows should be repeated in an extension and this also provides a strong clue as to the appropriate proportion for the extension itself. Recessing of windows i.e. the depth they are set back from the face of the elevation is a key characteristic of many of the older homes within the city. Replacement windows should very closely follow the character of the originals paying attention to their general pattern, means of opening and thickness of frames and glazing bars.
- 3.18 The external insulation of whole existing buildings in order to improve their energy performance is likely to promote lightweight cladding finishes and these may be difficult to reconcile with the established character of a neighbourhood where this is dominated by brick or masonry walls. A highly-contrasting render finish is unlikely to be acceptable and tile-hanging or some other form of ceramic or clay-based cladding may be more successful in an area dominated by brick. Consider the textures, rhythms, colours and tones that are present in the building, its setting and the wider context of the site in seeking suitable cladding materials and finishes.

4. Rear Extensions

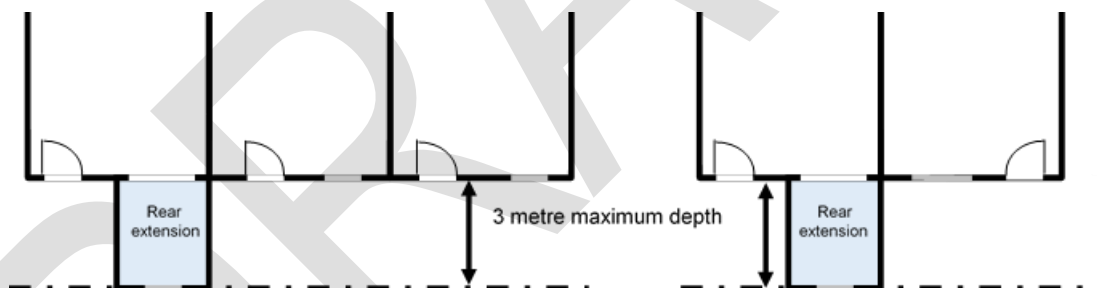
This chapter should be read in conjunction with Section 3: General Principles

- 4.1 Rear extensions may not always be in the public view, but it is still important to ensure the design quality is of a high standard so as not to detract from the character of the existing dwelling. A key consideration for both single and two-storey rear extensions is the impact upon the garden and rear external space, and the living conditions of a neighbouring property. This is particularly significant when the extension is near the property boundary.

Depth

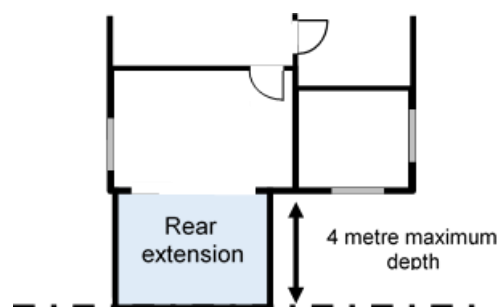
- 4.2 Extensions should be proportionate to the original building and avoid blocking natural light and outlook to neighbouring properties. The following depth limits ensure these requirements will be met (see also Figures 4.1 and 4.2):
- Terraced or semi-detached houses: maximum depth for a rear extension is **3 metres**.
 - Detached houses: maximum depth for a rear extension is **4 metres**.
- 4.3 Depth measurements should be taken from the main rear wall of the original house. If in doubt about measuring, contact the City Development team at Exeter City Council for advice.

Terraced and semi-detached houses



*Figure 4.1: Terraced or semi-detached houses: maximum depth for a rear extension is **3 metres**.*

Detached houses



*Figure 4.2: Detached houses: maximum depth for a rear extension is **4 metres**.*

- 4.4 Two-storey and first floor rear extensions are more likely to impact neighbours than single-storey ones in terms of natural light, outlook and amenity or living conditions. Therefore, in addition to the depth limits, the commonly adopted "45 Degree Rule" is used to assess proposals of this kind, as indicated in the diagrams below.
- 4.5 In the case of two-storey extensions, neighbouring properties should be clearly shown on both plan and elevation drawings, showing the position and size of their nearest windows in relation to the proposed extension.
- 4.6 Sun path analysis may be helpful to demonstrate the impact of proposals if they do not comply with the 45 Degree Rule, or in more complex situations.

The 45 Degree Rule – recommended by Building Research Establishment

1. Draw lines at 45 degrees from the centre of the nearest ground floor habitable room* windows of adjoining properties on an accurate, scale plan and ensure that the proposed plan fits within the area between the lines and the house (Figure 4.3).
2. Draw lines at 45 degrees from the centre of the nearest ground floor habitable room* windows of adjoining properties on an accurate, scale elevation and ensure that the proposed elevation fits within the space made by the lines (Figure 4.3).

* Habitable rooms include all living rooms, bedrooms and kitchens, but exclude bathrooms, or circulation space.

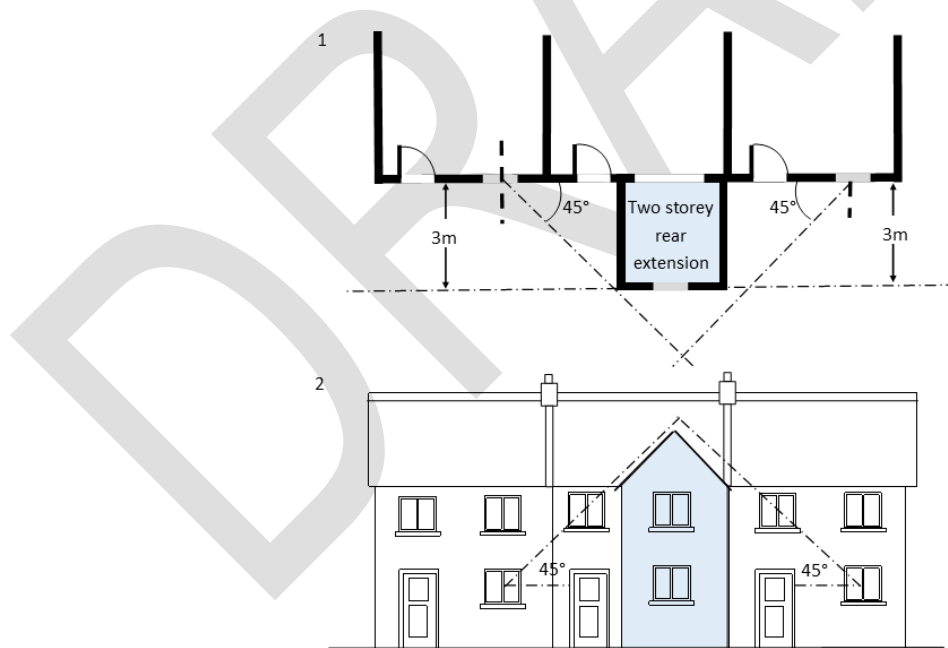


Figure 4.3: The 45 Degree Rule illustrated on a two-storey extension for a terraced property.

Width

- 4.7 The width of an extension should ensure it remains subservient, in keeping with the house's character and has an acceptable relationship with neighbouring properties. Full-width extensions can be permitted if these aims can be achieved. The side walls of rear extensions should not normally extend beyond the existing side walls of the existing dwelling, as this can impact the character of the property and broader area.

Privacy and outlook

- 4.8 Windows should not be placed on sidewalls overlooking neighbouring properties. High level, non-opening windows with obscure glass may be an acceptable solution in certain circumstances.
- 4.9 As outlined in the Local Plan, proposals for two-storey and first floor extensions should ensure that a minimum back-to-back distance of 22 metres is retained to preserve privacy (Figure 4.4). An extension may not be acceptable where the existing back-to-back distance is less than 22 metres and privacy is a concern.

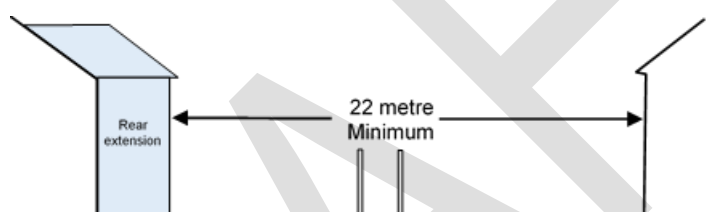


Figure 4.4: Back-to back distances: a minimum of 22 metres between the rear walls of the properties should be achieved in the interest of privacy and minimising overlooking.

- 4.10 In cases of single-storey extensions, the 22m rule may be applied where overlooking occurs: for example, where there is a change in level.
- 4.11 The use of a flat roof as a roof terrace over a single-storey rear extension is likely to harm the privacy of neighbours and will not be acceptable. New balconies to the rear of properties are also unlikely to be acceptable. See Section 7 for more information on balconies and roof terraces.

- 4.12 Residents should be able to enjoy a good quality outlook without adjacent buildings being overbearing. Where habitable room windows face onto a blank or largely blank wall of another building, a minimum distance equal to twice the height of the blank wall (measured from ground floor level to eaves or parapet) must be provided between the two buildings (Figure 4.5).

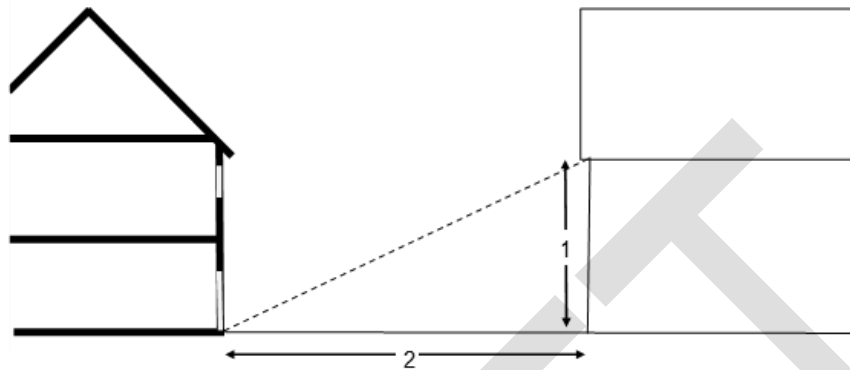


Figure 4.5: The distance between habitable room windows and a blank wall must be a minimum of twice the height of the wall.

- 4.13 Where there is a level difference between the two buildings, the distance must increase (Figure 4.6) or may decrease accordingly.

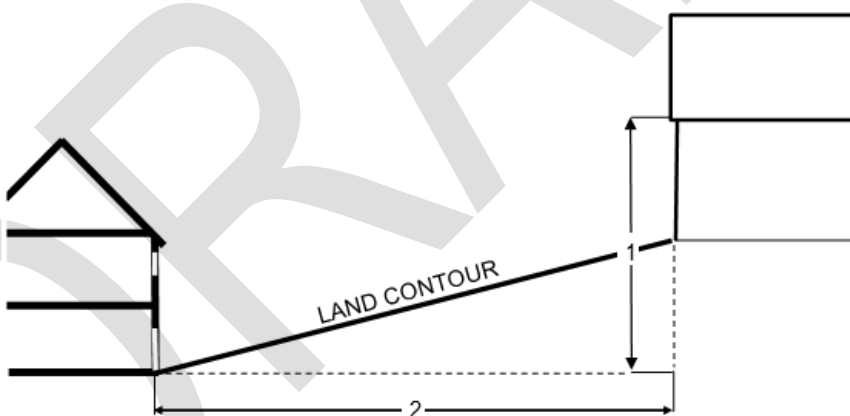


Figure 4.6: The distance between habitable room windows and an elevated blank wall must be a minimum of twice the height of the wall plus the level difference

Single-storey rear extension roof height

- 4.14 For single-storey rear extensions, there should be a gap of at least 150mm (about two brick courses) between the highest part of the roof of the extension and the underside of the first floor windowsills (Figure 4.7). This is visually pleasing and helps preserve the character of the original house. If proposals do not comply, justification should be submitted with the application.



Figure 4.7: Single-storey extension with 150mm gap between extension ridge and windowsills of the first-floor windows.

Conservatories

- 4.15 The criteria for single-storey extensions apply to conservatories. The design may need to include solid walls or fixed obscure glazing to prevent overlooking.

5. Side Extensions

This chapter should be read in conjunction with Section 3: General Principles

- 5.1 This chapter applies to single and multi-storey side extensions and first-floor side extensions over an existing structure such as a garage or carport.
- 5.2 In conjunction with the General Principles (Section 3), the guidance in this chapter will ensure that proposals preserve the character of the original house and the established street scene and protect the living conditions of the neighbours.

Position

- 5.3 Extensions should be set back at least 900mm from the front main wall to ensure that the extension will be subservient to the original house (Figure 5.1). This arrangement allows the new additions to be read separately from the old, helping to preserve the established character of the street. Where there is an existing ground floor side extension in line with the principal elevation, the extension should again generally be set back not less than 900mm at the first-floor level. Where the street is characterized by a strong building line, with no setbacks it may be acceptable not to provide a 900mm set back. Side extensions that project forward of the dwelling's front elevation are unlikely to be acceptable.
- 5.4 *Please note: 900mm is in accordance with brickwork dimensions.*

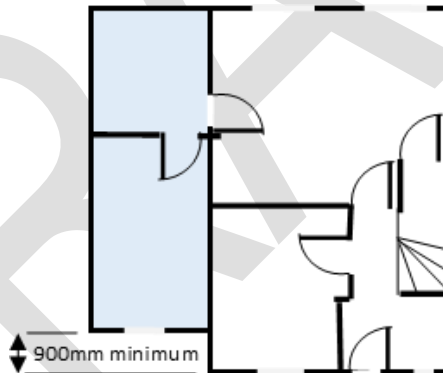
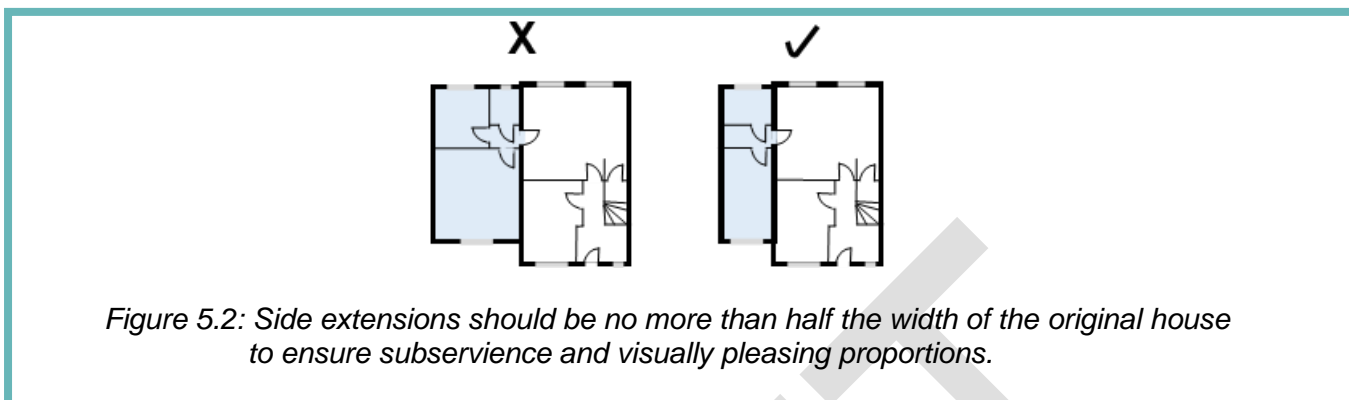


Figure 5.1: Side extensions should be set back at least 900mm from the front main wall of the house to ensure subservience.

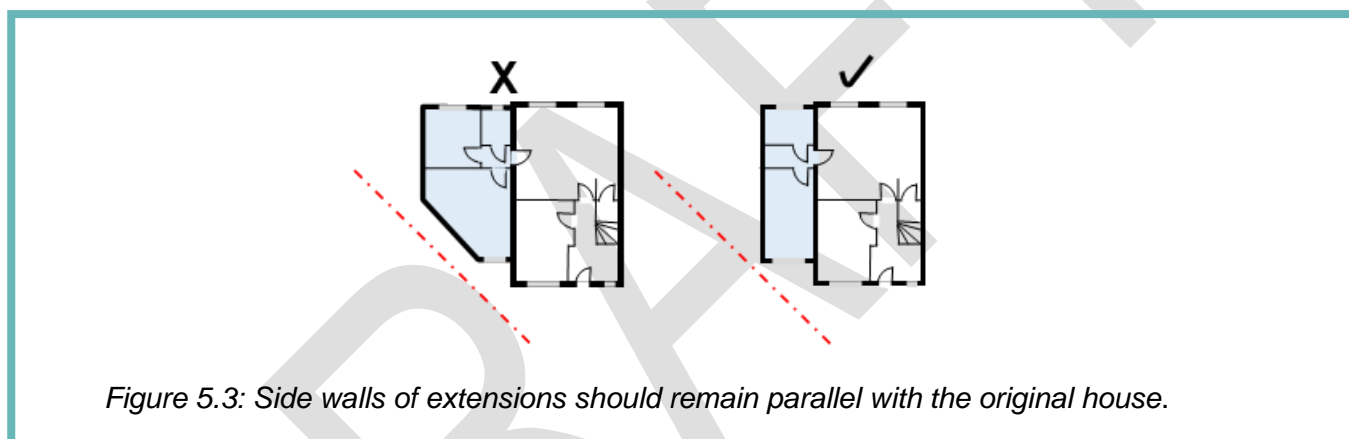
- 5.5 Single-storey side extensions beyond the rear main wall should comply with the guidance concerning depth for rear extensions outlined in Section 4. "Wrap around" extensions often do not look subservient and can harm the character of a dwelling and the amenity of neighbours but will be considered on an individual basis. Applicants are encouraged to use Exeter City Council's pre-application advice service to establish the best design solution.
- 5.6 Extensions of two-storey or higher, projecting beyond the rear main wall will not usually be permitted owing to the harm they may cause to the character of the main house, to the established townscape and neighbouring residential amenity.
- 5.7 Attention should also be given to a side extension's proximity to neighbouring boundaries and potential impact on neighbours. Any side extension close to the boundary risks being overbearing or causing overshadowing to the extent that it may not be acceptable.

Proportion

- 5.8 To ensure an extension is subservient and is of visually pleasing proportions, it should be no more than half the width of the original house (Figure 5.2).

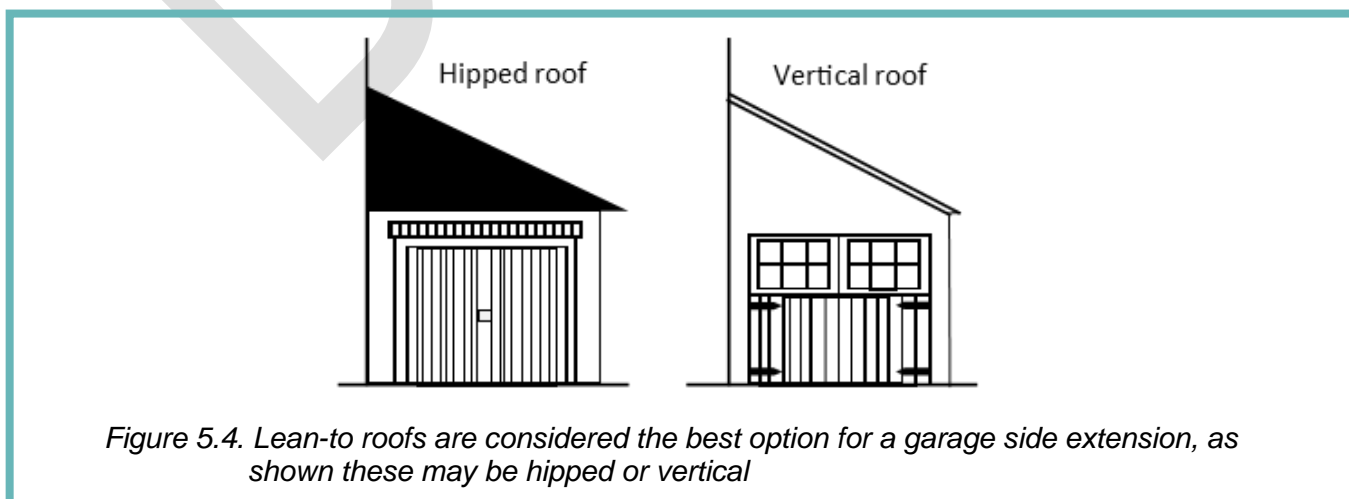


- 5.9 Side walls should remain parallel to the original house to ensure the established character of the street and the original house is maintained (Figure 5.3).



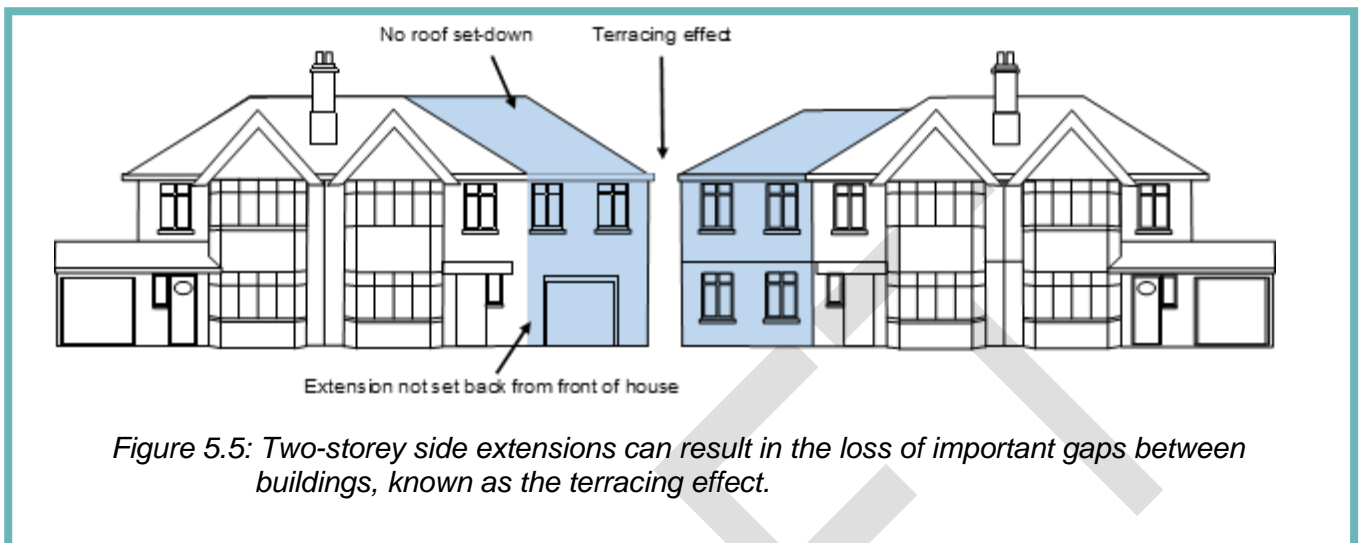
Garages and carports

- 5.10 The criteria for side extensions apply to garages and carports. A 'lean-to' will often be the best solution unless the original house has a flat-roofed design. A lean-to roof may be hipped or vertical (Figure 5.4).



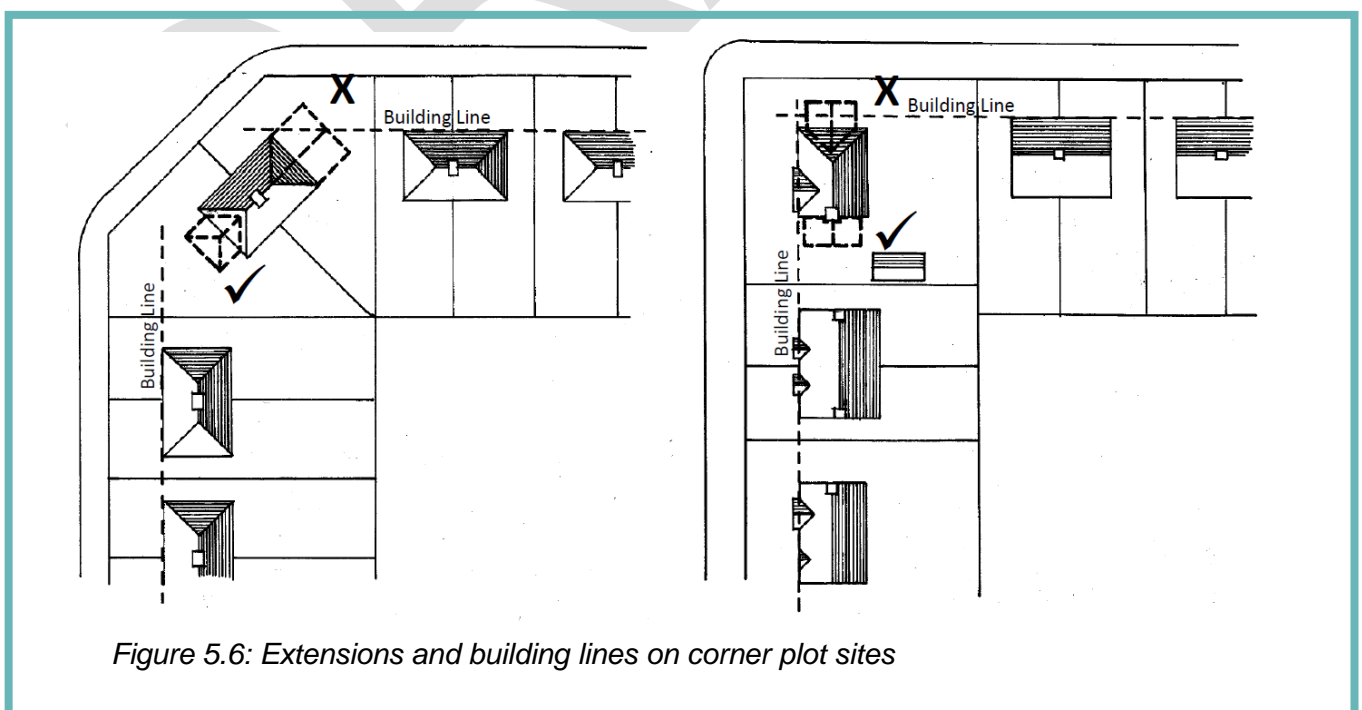
Terracing

- 5.11 Careful consideration should be given to the potential for increased massing created by side extensions, particularly at the first-floor level. Infilling the spaces between properties can create an unwanted terracing effect in the street scene (Figure 5.5)



Corner plots

- 5.12 A side extension on a corner plot may be visible within two streets and it is important that it is subservient to the host dwelling and is not dominant within either street scene. Extensions should be acceptable if they are set behind the building lines of properties on both streets (Figure 5.6) and adhere to the width and proportion criteria set out in Section 5. There may not always be a clear building line and in such cases the impacts on the street scene will be assessed on an individual basis.



6. Loft Conversions, Roof Lights and Solar Panels

This chapter should be read in conjunction with Section 3: General Principles

Principle and permitted development

- 6.1 Permitted development rights now provide greater scope for the addition of a dormer to the rear elevation of a property, often as part of a loft conversion. This permitted development right does not apply to homes located within a conservation area. To find out whether your home is within a conservation area please use our interactive map [Map of Conservation Areas - Exeter City Council](#). Please visit the Planning Portal for further advice on loft conversions: [Planning Permission - Loft conversion - Planning Portal](#).
- 6.2 When planning permission is required for a dormer, where there is an established townscape that is mainly without dormers, either at the front or rear of the property, proposals will not usually be acceptable. However, there may be greater scope where dormers have become an established part of the townscape.
- 6.3 If a dormer is required to provide headroom rather than just natural light for the proposed accommodation, the proposal is unlikely to be acceptable.

Position

- 6.4 The following guidelines are provided in relation to the positioning of dormers:
- Dormers should either be located centrally or symmetrically on the roof, or be aligned with the windows below (Figure 6.1 left hand image)
 - Dormers should be set a minimum of 0.5m (measured vertically) below the ridge level, 1m above eaves and 1m from the boundary. For gabled roofs, dormers should be set in a minimum of 1m from the edge of the roof (Figure 6.1 central image).
 - For hipped roofs, extensions should not come within 0.5m of the hip tiles (Figure 6.1 right hand image).

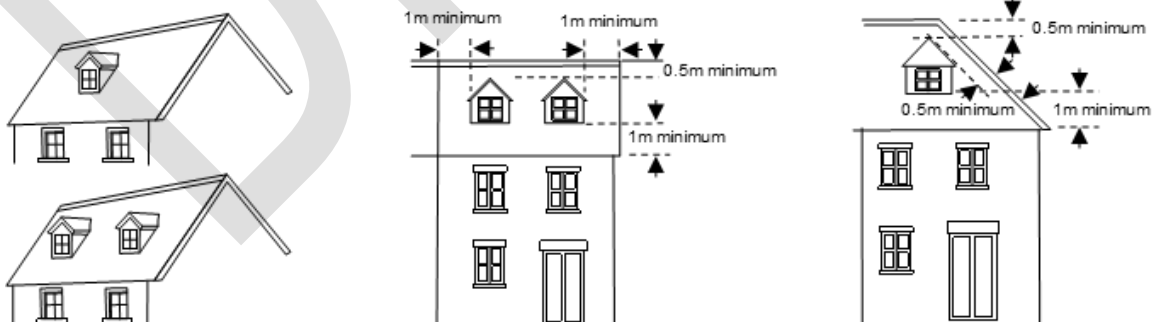


Figure 6.1: The three diagrams illustrate the advised positioning of dormers:

- 1) left hand image: within the roof and relative to the windows below;*
- 2) central image: in relation to the ridge and edge of the roof;*
- 3) right hand image: position in relation to hip tiles for hipped roofs.*

Size and scale

- 6.5 The size of dormers should be kept to a minimum so that the main roof of the house remains the dominant feature. The windows should be smaller than the habitable room windows on the main walls of the house so that the scale and proportions are visually pleasing (Figure 6.2).

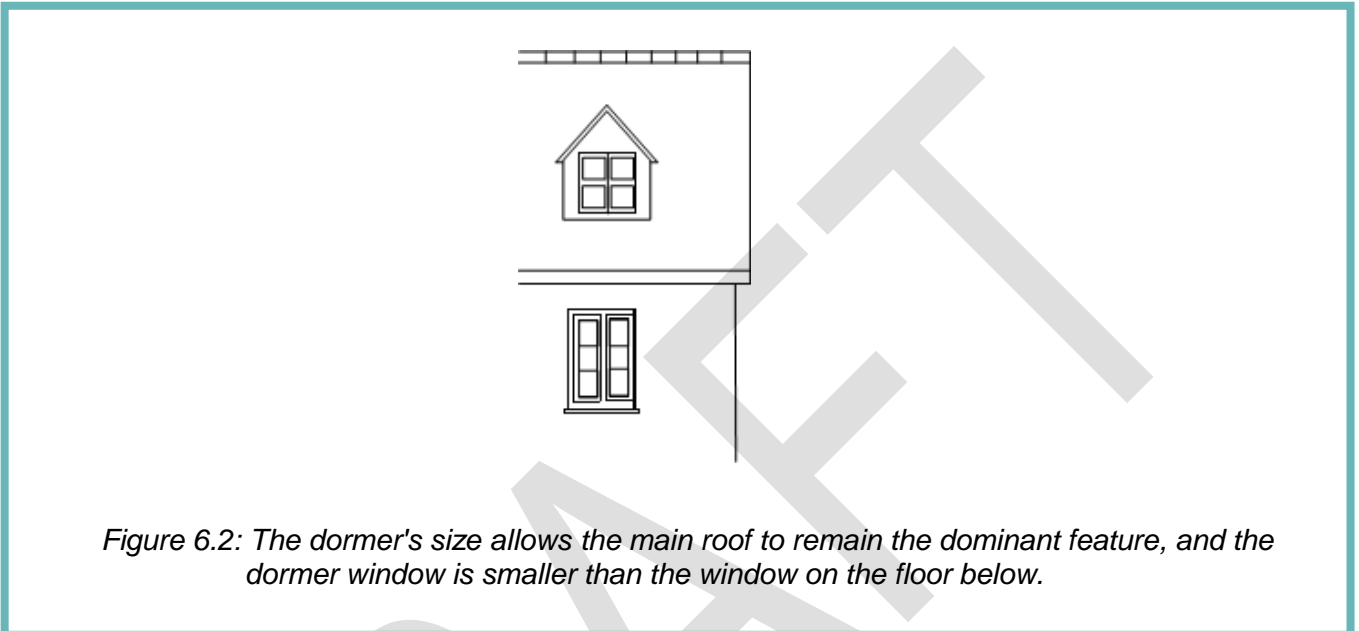


Figure 6.2: The dormer's size allows the main roof to remain the dominant feature, and the dormer window is smaller than the window on the floor below.

Design details

- 6.6 A range of designs of dormer roofs may be acceptable (Figure 6.3). The appropriate design solution should be based on the original house's character and the street scene. Dormer cheeks should be clad in materials to match or complement the main roof.

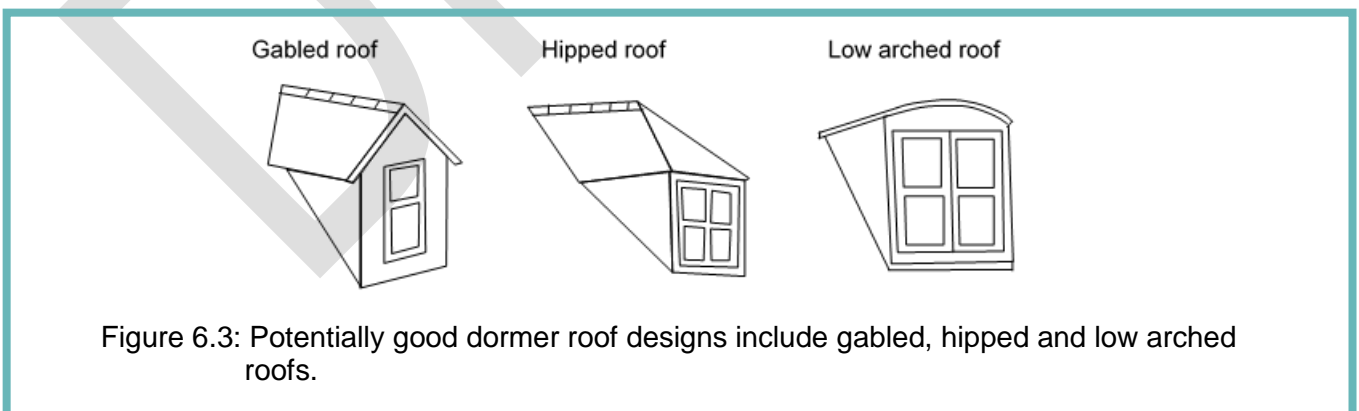


Figure 6.3: Potentially good dormer roof designs include gabled, hipped and low arched roofs.

Privacy

- 6.7 Where a dormer window or roof light increases the potential for overlooking into the rear of neighbouring properties, planning permission will not usually be granted.

Roof lights

- 6.8 The positioning of new roof lights within a roof slope should follow the design principles set out for dormers above. Where there are two or more roof lights to be introduced, they should be aligned, and a consistent size will normally create the most satisfactory appearance. Whenever possible, roof lights are best placed in the rear-facing slope so as not to be visible from the public street.
- 6.9 Roof lights that are the sole means of providing natural light to a space will only be acceptable if they are able to also provide a good outlook for occupants, whilst ensuring that overlooking is avoided.
- 6.10 In conservation areas, roof lights will not normally be approved if they result in harm to the character and appearance of the conservation area and therefore will not normally be approved on the front elevation. A rear elevation roof light in a conservation area is more likely to be supported where the visual impact is further reduced by specifying a type that can be fitted flush with the roof finish, sometimes referred to as a 'conservation roof light'. To find out whether your home is within a conservation area please use our interactive map: [Map of Conservation Areas - Exeter City Council](#).

Solar panels

- 6.11 In many circumstances, solar panels fixed to the wall or roof of a house are classed as 'permitted development' and do not require planning permission. Use the following link for further advice: [Interactive House – Planning Portal](#)
- 6.12 If the solar panels are to be installed on a listed building or within the grounds of a listed building, Listed Building Consent and/or planning permission are likely to be required. In this instance, contact the City Development team to discuss your proposal.
- 6.13 For solar panels that need planning permission we would advise the following:
- Colour and material: Choose solar panels that match the colour and material of your roof. Many manufacturers offer solar panels with various frames and cell colour options to blend in with the existing roof;
 - Low-profile mounting: Opt for low-profile mounting systems that keep the solar panels closer to the roof surface. This minimises the visual impact.
 - Symmetry and alignment: Ensure that the solar panels are aligned symmetrically and evenly spaced. This creates a balanced look and helps maintain the architectural harmony of your roof.
 - Hidden wiring: Conceal wiring and connections as much as possible. This can be done by routing cables through the attic or behind walls to maintain a clean and uncluttered appearance.
- 6.14 If your property is in a conservation area, there may be other limits that apply, please check the [Solar panels - Planning Portal](#) for further advice. To find out whether your home is within a conservation area please use our interactive map: [Map of Conservation Areas - Exeter City Council](#).
- 6.15 It is advised that you ensure that your roof can support the weight of solar panels without compromising its structural integrity. Building Regulations will normally apply when installing solar panels on your roof. Please contact Exeter City Council's Building Regulations Team to discuss: [Building regulation approval - Exeter City Council](#).

7. Roof Extensions and Alterations

This chapter should be read in conjunction with Section 3: General Principles.

- 7.1 This chapter applies to roof extensions and alterations, including changes to roof shape, raising of the ridge and the installation of balconies and roof terraces.

Altering the roof shape

- 7.2 Extensions involving roof alterations should ensure that they would not result in an imbalance between a semi-detached pair of dwellings or a small terrace. Proposals for altering the shape of roofs (e.g. from hipped roof to gabled roof) that result in imbalance will not be acceptable due to their detrimental impact on the street scene (Figure 7.1).
- 7.3 A well-designed alteration that returns symmetry to the pair may be acceptable.



Figure 7.1: The hip to gable extension here results in a negative imbalance to the symmetry of the pair of semi-detached dwellings.

Raising of the roof ridge

- 7.4 The acceptability of raising the ridge of a dwelling will depend on the area's character and a sympathetic design to respect the scale and general appearance of the street, including its topography.
- 7.5 Raising the ridge of a single property within a terrace or as part of a semi-detached pair is unlikely to be acceptable.
- 7.6 Where additional thermal insulation is proposed to be added to an existing roof then all alternative strategies should be explored before resorting to raising its height. But if this is demonstrated to be necessary then this will be supported providing that very careful detailed design in accord with the General Principles (Section 3) is exercised and the original eaves line is maintained.

Additional storeys

- 7.7 Additional storeys may be permitted on detached properties where they are sympathetically designed and respect the scale, continuity, roofline and general appearance of the street, including its topography.

Balconies and roof terraces

- 7.8 Balconies or raised platforms will be assessed regarding design and impact on residential living conditions, including privacy. In many cases, they can significantly affect a neighbour's privacy and create a sense of overlooking, particularly if they are located where it is possible to look into gardens or windows that previously enjoyed privacy. The presence of balconies and roof terraces may also result in noise disturbance, particularly to nearby windows, and can also be harmful to the appearance of a building. Careful consideration must be given to the location and design of a balcony or a terrace, including any associated balustrades.
- 7.9 Balconies and roof terraces at the front and rear of the building, or any other prominent locations visible from the street, will only be acceptable where they do not harm the appearance of the building and the street scene.

Privacy

- 7.10 Roof extensions or alterations to include a balcony or roof terrace are unlikely to be acceptable where they are likely to overlook neighbouring properties and gardens.

8. Detached Garages, Outbuildings and Boundaries

This chapter should be read in conjunction with Section 3: General Principles.

Location of garages and outbuildings

- 8.1 Detached garages and outbuildings should be set back at least 1m from the front main wall of the house to preserve the character of the street (Figure 8.1).

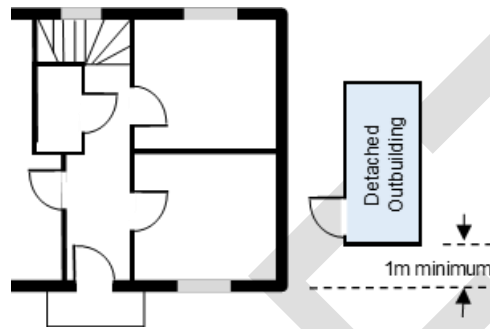


Figure 8.1: The street's character will be preserved by setting back garages and outbuildings.

Subordinate and ancillary outbuildings

- 8.2 Outbuildings should be ancillary in use i.e. intended to be used by those living in the main house, and subordinate in scale to the dwelling.
- 8.3 Outbuildings that would function as new dwellings i.e. include all the facilities for self-contained living (including an opportunity for its own access), or are used as commercial space/premises, or a workshop for trade and employment, would not fall under the definition of a householder development. Such works will need planning permission in their own right and a different type of planning consent to the simplified householder planning consent. The different planning consents are outlined on the Planning Portal: [Consent types - Planning Portal](#).

Design details

- 8.4 Detached garages and outbuildings should be confined to single-storey, so they are clearly subservient to the original house. A garage or outbuilding may not be acceptable where changes in level result in walls significantly higher than the standard domestic single-storey height. Garages should follow the General Principles (Section 3) by respecting the architectural character of the dwelling.
- 8.5 Double garages in conservation areas or associated to a listed building, should be accessed by two separate doors divided by a pier (Figure 8.2). Garage doors can significantly impact the established character of the original house and the street scene. Timber doors vertically rather than horizontally clad are normally the most appropriate design solution across various architectural styles.

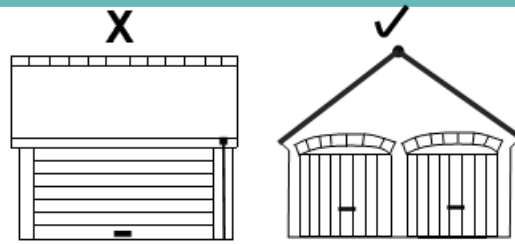


Figure 8.2: Double garages should be accessed by two separate doors divided by a pier if in a conservation area or within the setting/surroundings of a listed building.

- 8.6 The width of driveways should be kept to a minimum to reduce the impact on the street scene. They should be surfaced in materials that complement the house and its garden. Enclosure to the street should be maintained by walls, railings, gates or planting (Figure 8.3). Particular consideration will be given to proposals for driveways in conservation areas where there is a need to protect the heritage value of the street scene and the established character of the front boundaries. To find out whether your home is within a conservation area please use our interactive map: [Map of Conservation Areas - Exeter City Council](#).



Figure 8.3 The design of detached garages and drives should respect the local street scene.

- 8.7 Any queries regarding dropped kerbs should be directed to Devon County Council as the local Highway Authority which is responsible for alterations to the adopted highway (see Section 9 for more information). If the kerb is on a classified road, planning permission will also be needed.

Cycle storage

- 8.8 Structures to store cycles in front gardens will usually require planning permission. Exeter City Council will encourage and support cycle storage when appropriately designed. Cycle storage should not dominate the front garden, particularly where it will be prominent in the street scene or affect the setting of heritage assets. Acceptability will depend on the size and position of the storage in relation to the dwelling and the street scene and on the size of the front garden area. Where space is limited, and the storage would be prominent in the street scene, the structure should:
- Be the minimum size required to store one or two bicycles.
 - Be constructed of high-quality materials and colours appropriate to the setting.
 - Be positioned to respect the architectural appearance of the dwelling and avoid visual conflict with features such as windows or window ledges.
- 8.9 Further information on provision of cycle parking can be found in Chapter 6 of the [Residential Design Guide SPD - Exeter City Council](#).

Boundaries

- 8.10 In terms of their design, Exeter City Council seeks to ensure that private boundary treatments that face public places should provide an appropriate level of security whilst making a positive contribution to the townscape. Close-boarded timber screen fences facing streets and public places will not be acceptable. Enclosure to front gardens should therefore be by walls, railings or hedges in order to create an attractive appearance and provide 'defensible space' (Local Plan policy DG4 part d) between the dwelling and the street.
- 8.11 Although not a common characteristic of boundaries in the city, planted hedgerows do form a distinctive feature in some neighbourhoods and they have great potential to support and enhance biodiversity. This type of boundary would not need planning permission, but may need to be accompanied by a temporary wire fence whilst the hedgerow became established (to contain pets, for instance).
- 8.12 A particular type of boundary treatment may be one of the defining characteristics of a conservation area. Maintaining and enhancing an existing pattern and means of enclosure may be an important consideration in a conservation area. To find out whether your home is within a conservation area please use our interactive map: [Map of Conservation Areas - Exeter City Council](#).

9. Other Relevant Information

Conservation areas and listed buildings

- 9.1 Pre-application advice should be sought for proposals affecting conservation areas and listed buildings. Please visit [Planning pre-app advice - Exeter City Council](#). To find out whether your home is within a conservation area please use our interactive map: [Map of Conservation Areas - Exeter City Council](#).
- 9.2 All extensions, and many alterations, to listed buildings require 'Listed Building Consent' which is a separate process to obtaining planning permission. For further information visit: [Listed buildings - Exeter City Council](#).
- 9.3 For further information on undertaking work in conservation areas, please visit [Conservation areas - Other permissions you may require - Planning Portal](#).
- 9.4 For further information on alterations or extensions to listed buildings, please visit [Listed Buildings - Other permissions you may require - Planning Portal](#).

Archaeology

- 9.5 On infrequent occasions, development can affect archaeological sites. Separate consent is required for this. Groundworks within central Exeter and in other historic areas can also affect buried remains. Please see the guidance on archaeology and development in Exeter: [Archaeology and Development SPG - Exeter City Council](#) or seek pre-application advice.

Trees

- 9.6 Trees within conservation areas and trees protected by Tree Preservation Orders cannot be felled or pruned without the consent of Exeter City Council. To check whether any trees within or adjacent to your site are protected, and how to apply for works to a protected tree, please visit our website: [Tree Preservation Orders - Exeter City Council](#).
- 9.7 Important trees need to be protected during construction. Exeter City Council has produced [Trees and Development SPD - Exeter City Council](#) to assist householders and developers in retaining trees successfully.

Ecology

- 9.8 Construction, demolition, extension or conversion proposals could affect a bat roost in a building. Exeter City Council will expect a bat survey to be submitted with a planning application in certain circumstances. Please see national advice for further information [Bats: advice for making planning decisions \(gov.uk\)](#).
- 9.9 Exeter City Council encourages householders to incorporate small scale opportunities for biodiversity enhancement in their proposals. These might include creating new habitats, enhancing existing habitats, providing green roofs and walls, planting trees or using sustainable drainage systems. Relatively small features can often achieve essential benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different habitat areas.

Highways: dropped kerbs, skips and scaffolding

- 9.10 A dropped kerb, often referred to as a vehicle crossing, is a section of pavement that allows vehicles to cross from the road over the pavement. Typically these do not require planning consent to be obtained from Exeter City Council. However, dropped kerbs nearly always require a licence to be applied for through Devon County Council before any work is carried out. Further information can be found by visiting: www.devon.gov.uk/roads-and-transport/make-a-request/devon.gov.uk and selecting 'Apply for a dropped kerb (vehicle crossing)'.
- 9.11 Skips, scaffolding and the storage of other materials or equipment on the highway, the term highway includes the pavement, nearly always need a licence which should be applied for through Devon County Council. Further information can be found by visiting: www.devon.gov.uk/roads-and-transport/make-a-request/devon.gov.uk.

Flood risk

- 9.12 Extensions within flood zone two and three will require a simple Flood Risk Assessment. Further information can be found via the following links:
- [Flood map for planning \(gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/281222/flood-map-for-planning.pdf)
 - [Flood risk assessment in flood zones 2 and 3 \(gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/281222/flood-risk-assessment-in-flood-zones-2-and-3.pdf)
 - [Preparing a flood risk assessment: standing advice \(gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/281222/preparing-a-flood-risk-assessment-standing-advice.pdf)

Underground services

- 9.13 Applicants should consult the relevant bodies, such as South West Water, Wales and West Utilities and Western Power, to avoid building too close to or over underground services such as water, gas and electricity.

Householder's Guide: Design of Extensions and Alterations

Supplementary Planning Document



Your views are valued and responses to the questions will help shape the final version of the document

Contact details

Local plans team, Exeter City Council,
Civic Centre, Paris Street, Exeter, EX1 1JN

01392 265080

planning.policy@exeter.gov.uk

exetersays.commonplace.is



Please contact us to request this information in an alternative format or language.

We consider requests on an individual basis.

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Equality Impact Assessment: Householder’s Guide to Extension Design Supplementary Planning Document (SPD) Update and 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 Committee - 3 rd October	Householder’s Guide to Extension Design Supplementary Planning Document (SPD) Update and Consultation (To be renamed - Householder's Guide: Design of Extensions and	That the Executive approves the ‘Householder's Guide: Design of Extensions and Alterations’ as the basis for public consultation	Potentially all groups with protected characteristics. The Guide has the potential to impact upon all residents of Exeter. The aim is that the Guide will improve the city and the lives of all

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
	Alterations)	<p>commencing on 23 October 2023;</p> <p>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 'Householder's Guide: Design of Extensions and Alterations' before it is published for consultation;</p> <p>and</p> <p>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 a change to the consultation start date if required.</p>	residents irrespective of protected characteristics.

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
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	Neutral	Low	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated. The previous experience of some groups (gypsies and travellers, asylum seekers and others) may mean they feel marginalised and excluded from the planning process including consultation. Efforts should be given during the consultation to ensure all groups irrespective of race and ethnicity can access the consultation process. A web based approach will be taken in order to allow access to as many groups as possible.
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.	Neutral	Low	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
Sex/Gender	Neutral	Low	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
Gender reassignment	Neutral	Low	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Neutral	Low	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Sexual orientation (including heterosexual, lesbian, gay, bisexual).	Neutral	Low	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
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	Low	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated. 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. None the less the consultation will accord with the Council's adopted Statement of Community Involvement and Consultation Charter, this case the impact is considered to be neutral.
Pregnancy and maternity including new and breast feeding mothers	Neutral	Low	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
Marriage and civil partnership status	Neutral	Low	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.

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

Officer: Hayley Stokes

Date: 4th September 2023

REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

REPORT TO COUNCIL

Date of Meeting: 17 October 2023

Report of: Director Net Zero and City Management

Title: Food Law and Health and Safety Enforcement Service Plan 2023 - 2024

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 2023-24. 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 2023-24

2.2 That Council approves:

- a) the Food Law and Health and Safety Service Plan 2023/24; and
- b) that delegated authority be given to the the Service Lead – Environmental Health and Community Safety being authorised to change the plan if necessary 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 2023/24; 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 2023/24.

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.

4.3 To aid succession planning of the service and to bring people into a career in local government and environmental health, the Business Regulation Team has turned a part time Environmental Health Officer role into a 4 year apprenticeship. This has been funded from existing budgets, with training aspects paid for by the apprenticeship levy. This positive move will allow the experienced staff within the service help develop a new Environmental Health Officer into the profession.

5. Section 151 Officer comments:

5.1 There are no additional financial implications for Council to consider arising from 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:

The content of this report raises no issue of concern to the Monitoring Officer who is supportive of both the content and recommendations.

8. Report details:

Key Achievements in 2022/23:

8.1 Programmed Interventions

The service inspected 320 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.

99% of food premises within the city were found to be broadly compliant with food hygiene law.

During the year 183 new food businesses were received by the service

59 proactive health and safety inspections were undertaken

8.2 Service Requests / other interventions

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. 281 such requests were received by the service during 2022/23.

478 other visits and interventions were made to businesses.

110 accident reports from businesses have been received and looked into.

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.

50 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.

40 infectious disease notifications were received by the service in 2022/23, Campylobacter remains the most common cause of bacterial foodborne illness in the UK.

8.5 Primary Authority

The service currently has 7 active Primary Authority Partnerships.

8.9 Proposed key activities for 2023/24

8.9.1 Maintain high standards in food safety by:

- Following the FSA's post Recovery Plan guidance by applying a risk-based and intelligence led approach to the prioritisation of food interventions. Interventions for higher risk businesses or those that are likely to be high-risk will always take priority over interventions for lower risk businesses.
- 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
- Building our customer base for taught Level 2 food hygiene courses whilst promoting e-learning to those who prefer to learn that way.
- Recognising food business trends such as the growth of home/mobile catering and internet sales and offering hygiene guidance and advice in an appropriately accessible format.

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 conduct water quality sampling of swimming pools and private water supplies.
- Co-ordinate multi-agency visits where migrant worker/modern slavery issues are suspected or identified
- Review and refresh the means of business engagement and training using innovative means to help business grow and thrive.
- 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 2023-24 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:

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

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Exeter
City Council

Environmental Health and Community Safety

Food Law and Health and Safety Enforcement Service Plan

2023 – 2024

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: September 2023

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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 265147 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 that 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 132,100 persons with 72.8% of working age.

3.1.2 There are a total of 5,173 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 meat and dairy products.

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 that 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 2022/23, the service:

- Registered 183 new food businesses
- Conducted 320 food hygiene inspections
- Received 211 service requests relating to food businesses, of which 64 were complaints about food and 74 concerned the hygiene of premises
- 7 requests for food hygiene rating scheme revisits were received and the premises were subsequently revisited
- 99% of food premises within the city were broadly compliant with food hygiene law
- 40 food poisoning cases were investigated
- 50 food samples were taken, 2 of which were unsatisfactory, 4 borderline.

4.2 Health and Safety performance

4.2.1 During 2022/23:

- 59 proactive health and safety inspections were undertaken.
- 424 other visits/face to face contacts (e.g. health and safety training, Safety Advisory Group attendees etc.) were made
- 54 non-inspection interventions (e.g. complaints, incident investigation, pool sampling visits) were made
- 70 health and safety service requests / complaints were dealt with
- 110 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 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.

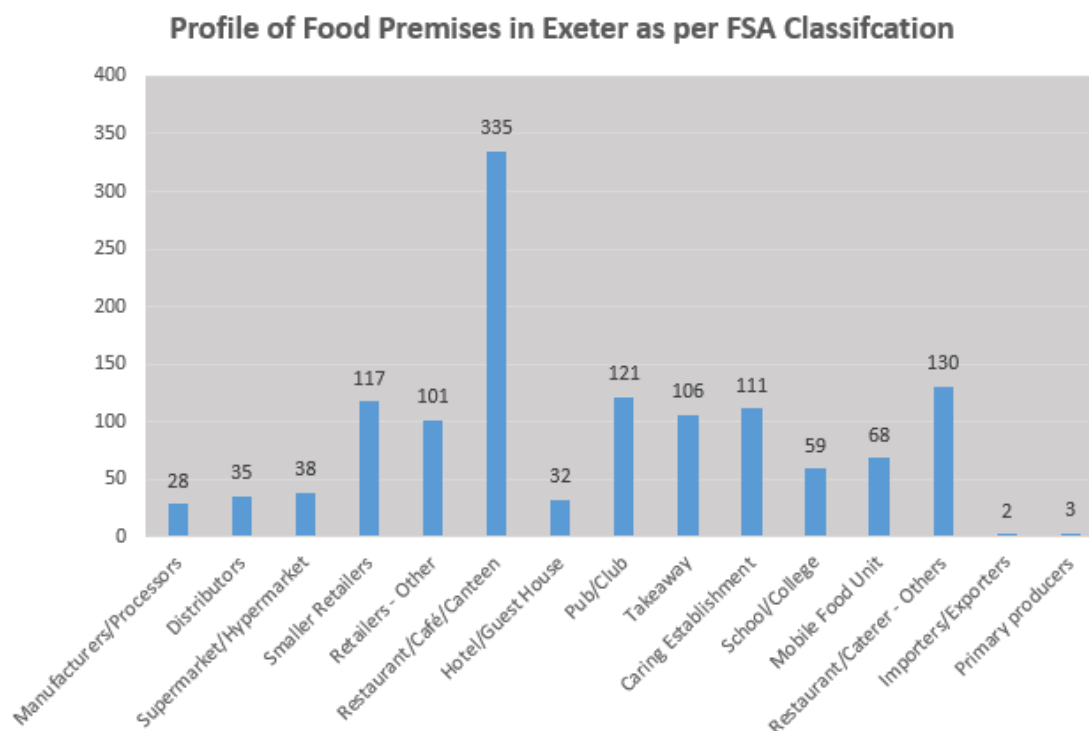
5.1.2 The Council believes in fair regulation and the team uses a variety of means to ensure that individuals and organisations meet their responsibilities including education, negotiation, advice, guidance, warning letters, formal notices and prosecution. Overall, the service seeks to work in collaboration 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 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 should be inspected at least once every 6 months, category D premises every 2 years.

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 2023	1	22	119	672	420	57	1291

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 set out how local authorities should resume food interventions post-Covid, the emphasis being on the inspection of higher-risk (category A-C) premises, with visits to lower-risk premises carried out where resources allowed.
- 5.3.5 The Recovery Plan ended in March 2023, the Council successfully meeting its targets. An end-of-year return to the Food Standards Agency reported that, for the period April 2022 to March 2023:
- 1 Category A food businesses received a food hygiene intervention; no A-rated establishments were overdue an inspection on 1 April 2023.
 - 20 Category B food businesses received a food hygiene intervention; no B-rated establishments were overdue an inspection on 1 April 2023.
 - 62 Category C food businesses received a food hygiene intervention; no C-rated establishments were overdue an inspection on 1 April 2023.
 - 5 less than broadly compliant Category D food businesses (i.e. those with a food hygiene rating of 0-2) received a food hygiene intervention; no less than broadly compliant D-rated establishments were overdue an inspection on 1 April 2023.
 - Resources allowed the inspection of an additional 97 Category D and 15 Category E food businesses plus 113 unrated (i.e. new) food businesses.
- 5.3.6 Following completion of the Recovery Plan, the Food Standards Agency advises local authorities to apply a risk-based and intelligence led approach to the prioritisation of interventions as they work towards re-aligning with the Food Law Code of Practice. Interventions for higher risk businesses or those that are likely to be high risk should always take priority over interventions for lower risk businesses.
- 5.3.7 As part of its *Achieving Business Compliance* model, the Food Standards Agency is consulting on a new risk-based approach towards intervention frequencies, allocating a risk profile to each business that could see inspection frequencies ranging from every 2 months to every 5 years, depending on the inherent risk, level of compliance and confidence in management. This is likely to be in place by April 2025.
- 5.3.8 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.
- 5.3.9 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)
- 5.3.10 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 that 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. South West (formerly 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 is placed on the Council web site and social media accounts as necessary; recently this has included practical guidance for people running food businesses from home. Approximately a third of new food business registrations received over the past year are at private addresses.
- 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'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.

5.8.3 A Single Case Management Plan has been drawn up between UK Health Security Agency's SW Health Protection Team 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. As at April 2023, 1124 businesses fall within the scope of the scheme, with all ratings 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 As at April 2023, 99% of rated food businesses in Exeter are classed as ‘broadly compliant’, i.e. rated 3 or above:

FHRS Rating	Nov - 22	Dec - 22	Jan - 23	Feb - 23	Mar - 23	Apr - 23
5 - Very good	972	975	972	971	974	976
4 - Good	106	108	112	115	110	112
3 - Generally satisfactory	36	32	32	32	30	32
2 - Improvement required	5	4	2	2	2	1
1 - Major improvement required	3	2	2	3	6	3
0 - Urgent improvement required	0	0	0	0	0	0
Total rated establishments	1122	1121	1120	1123	1122	1124
Establishments with rating of 3 or better	1114	1115	1116	1118	1114	1120
Awaiting inspection	52	54	56	50	54	54
Exempt	54	54	54	54	54	53
Sensitive	26	25	25	26	26	26
Excluded	29	29	30	33	31	30
Total establishments	1283	1283	1285	1286	1287	1287

A small number of establishments are not included in the food hygiene rating scheme. Businesses not supplying food to the final consumer or those that are extremely low-risk and not generally recognised as food businesses are classed as *excluded* and *exempt* respectively. Businesses with sensitivities around publishing addresses (childminders, military establishments etc.) are classed as *sensitive*

5.11.3 Food businesses rated four 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.

5.11.4 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;

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 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:

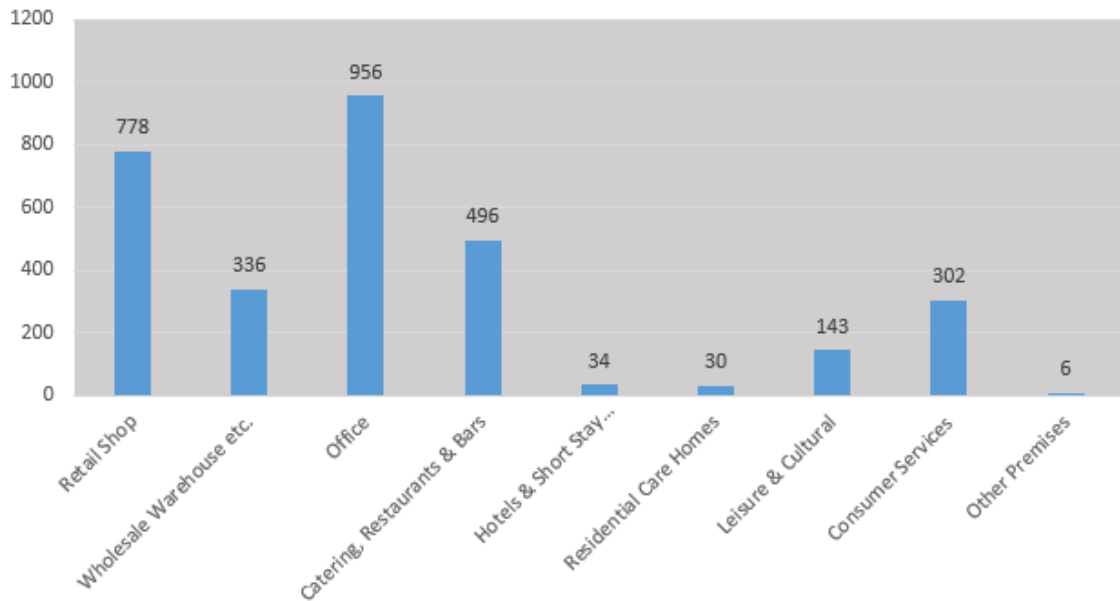
- a belief that enforcement must be firm but fair;
- the need for proportionality in the application of the law;
- showing transparency about how the service operates;
- a need for targeting of enforcement action;
- a need to deliver consistency of approach and
- the need to balance enforcement and education 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 3000 premises.

Profile of Exeter Businesses as per HSE Classification



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 12) 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.
- 6.2.4 HSE's 2022 strategy *Protecting People and Places* sets out a number of strategic objectives, including reducing work related ill health with a specific focus on mental health and stress.
- 6.2.5 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.

6.3 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.12), 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 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 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.
- 6.3.8 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.
- 6.3.9 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 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 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.
- 6.4.3 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.
- 6.4.4 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.
- 6.4.5 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.
- 6.4.6 No complaints have been received regarding the service provision of the Authority.
- 6.4.7 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.

6.5 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.12) - *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 plasterboard, 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.12) 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. Highlights of the 2022/23 return can be found at 4.2.1

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 that 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 that 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.
- 6.11.5 Injuries from being struck by vehicles in a warehouse environment are one of the priorities on the HSE list referred to at 6.6.2. In 2022, 350 Exeter warehouses were sent information – including a checklist and links to online resources - on safe workplace transport. A proportion of these businesses later received a visit to check compliance, with appropriate action being whenever necessary to ensure adequate vehicle and pedestrian segregation.

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 130 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 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 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. In 2022, by carrying out sampling over a period of time, we were able to help one of our primary authority partners to determine a suitable shelf life for a newly developed range of food products prior to them going into production.
- 7.3.2 Devon & Cornwall Chief Officers Food Sub Group: The food sub group liaises with UKHSA to help inform the contents of a number national/regional sampling plans each year. Members choose from a list of potential sampling initiatives based on their understanding of those foods/practices likely to be of highest risk/greatest concern. In 2022, unsatisfactory samples of vegan cheese taken from an Exeter deli helped the manufacturing authority identify an unregistered food business operating in their area.
- 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 as a means of verifying controls at a critical step in a food operation and monitoring of imported food 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 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 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	2023										2024		
Months of sampling	A	M	J	J	A	S	O	N	D	J	F	M	
UK Health Security Agency Studies													
Study 77 – Ready to eat salads and salad components from retail and catering													
Study 78 – Hygiene in catering premises													
Legionella in underused/lower temperature water systems													
Exeter Specific Sampling Programme													
Swimming Pool Sampling													
Private Water Supply Sampling													

8 Environmental Health Training Service

8.1 Scope of the Training Service

8.1.1 The service has established a robust cost effective training service for Exeter and the surrounding area.

8.2 Main Provisions of the Training Service

8.2.1 Food handlers must receive adequate supervision, instruction and /or training in food hygiene for the work they do. The owner of the food business is responsible for ensuring that this happens. There is an equivalent legal position under Health and Safety legislation and businesses have a legal duty to assess the risks within their operation and the take precautions to minimise that risk.

8.2.2 The Environmental Health training services provision has been at the forefront of training since the establishment of the first formal courses. Over the years, the Environmental Health Training Portfolio has established itself as a primary provider of Environmental Health training courses in Exeter and the surrounding area. The authority aims to provide this service on a cost neutral or profit-making basis.

8.2.3 The training and education activities are principally directed to workplace and consumer health protection, although increasingly educational establishments and the voluntary sector are using the service. The service embraces the principles of excellence in public services and Better Regulation and looks to make the most effective use of available resources to achieve maximum gain.

8.2.4 Exeter City Council is a registered Royal Society of Public Health training centre, offering face-to-face taught RSPH Level 2 food hygiene courses. Courses are run at The Matford Centre approximately four times per year; additional off-site training can be provided where organisations are able provide appropriate facilities and a sufficient number of delegates.

8.3 Access to Training

- 8.3.1 The service looks to actively encourage delegates who require additional support in terms of, language difficulties, poor literacy or numeracy skills, physical or mental challenges, dyslexia or other literacy problems.
- 8.3.2 Where additional support is required, this can be provided through the provision of language specific course materials, extension of guided learning hours, oral examinations, extended examination period, alterations to the method of instruction or provision of specific courses. The service also provides training in other languages to meet the diverse needs of the business community.
- 8.3.3 E-learning courses, which allow candidates to study at their own pace, are offered as an alternative to those unable to attend taught courses. Our e-learning Level 3 course is popular as an equivalent taught course would require 3 or 4 days in a classroom environment.

8.4 Financial Implications

- 8.4.1 The service is run on a cost neutral basis to the authority.
- 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 2023/24 – Food Safety Function

	Salary (+)	Equipment	Travel
<u>Commercial F020</u>	273,940	10,090	800
Proportion allocated to Food Safety Function (40%)			
Analysis (max)	109,576	4036	320
Purchase of Samples		260	
		300	
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 2023/24 – Health and Safety Function

	Salary (+)	Equipment	Travel
<u>Commercial F020</u>	273,940	10,090	800
Proportion allocated to Health & Safety Function (40%)	109,576	4036	320

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 2023/234 – Training Provision

	Salary (+)	Equipment	Travel
<u>Health Education F018</u>	5,500	16,380	-
Proportion allocated to Health & Safety function (20%)	1,100	3,276	-
Proportion allocated to Food Safety function (80%)	4,400	13,104	-

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. A new Apprentice EHO post has been created this year, studying for a BSc in Environmental Health at University Centre Weston, whilst gaining valuable work experience in the Business Regulation Team.

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

Title	Qualification	Role
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
Apprentice EHO	Working towards BSc Environmental Health	Practical experience in the Business Regulation Team whilst studying for BSc.
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 and Food Safety groups as well the Health Protection Advisory Group organised by UK Health Security Agency.
- 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.
- 10.1.7 The Food Standard Agency's consistency exercise is undertaken annually to ensure the consistent application of the Food Rating Scheme. In addition, consistency matters are discussed regularly at weekly team meetings.

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 2023/2024:

- 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:

- Following the FSA's post Recovery Plan guidance by applying a risk-based and intelligence led approach to the prioritisation of food interventions. Interventions for higher risk businesses or those that are likely to be high-risk will always take priority over interventions for lower risk businesses.
- 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
- Building our customer base for taught Level 2 food hygiene courses whilst promoting e-learning to those who prefer to learn that way.
- Recognising food business trends such as the growth of home/mobile catering and internet sales and offering hygiene guidance and advice in an appropriately accessible format.

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 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 grow and thrive.

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

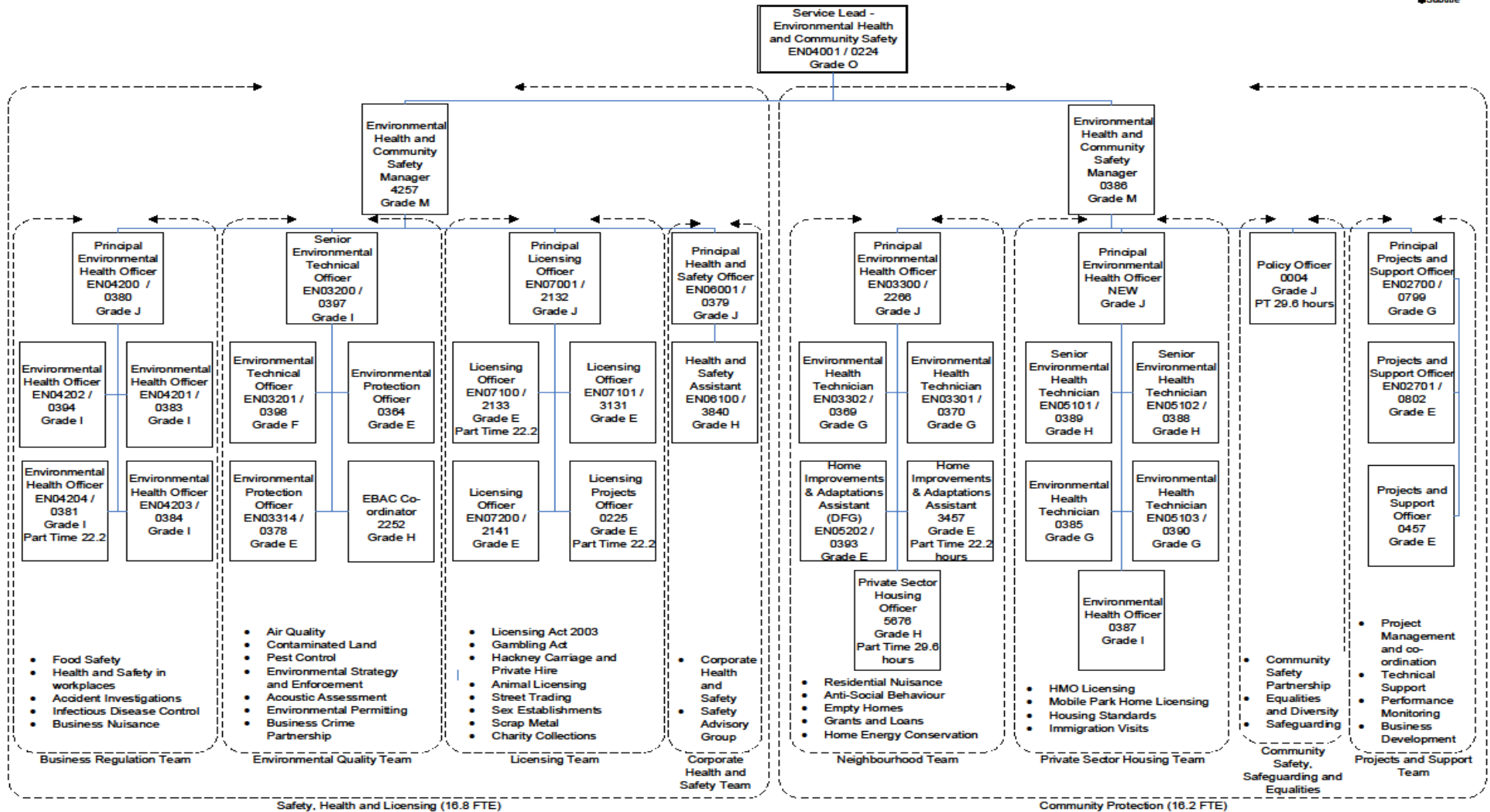
Appendix A – Service Structure

7/28/2020

Structure of Environmental Health and Community Safety – 34 FTE

Subtitle

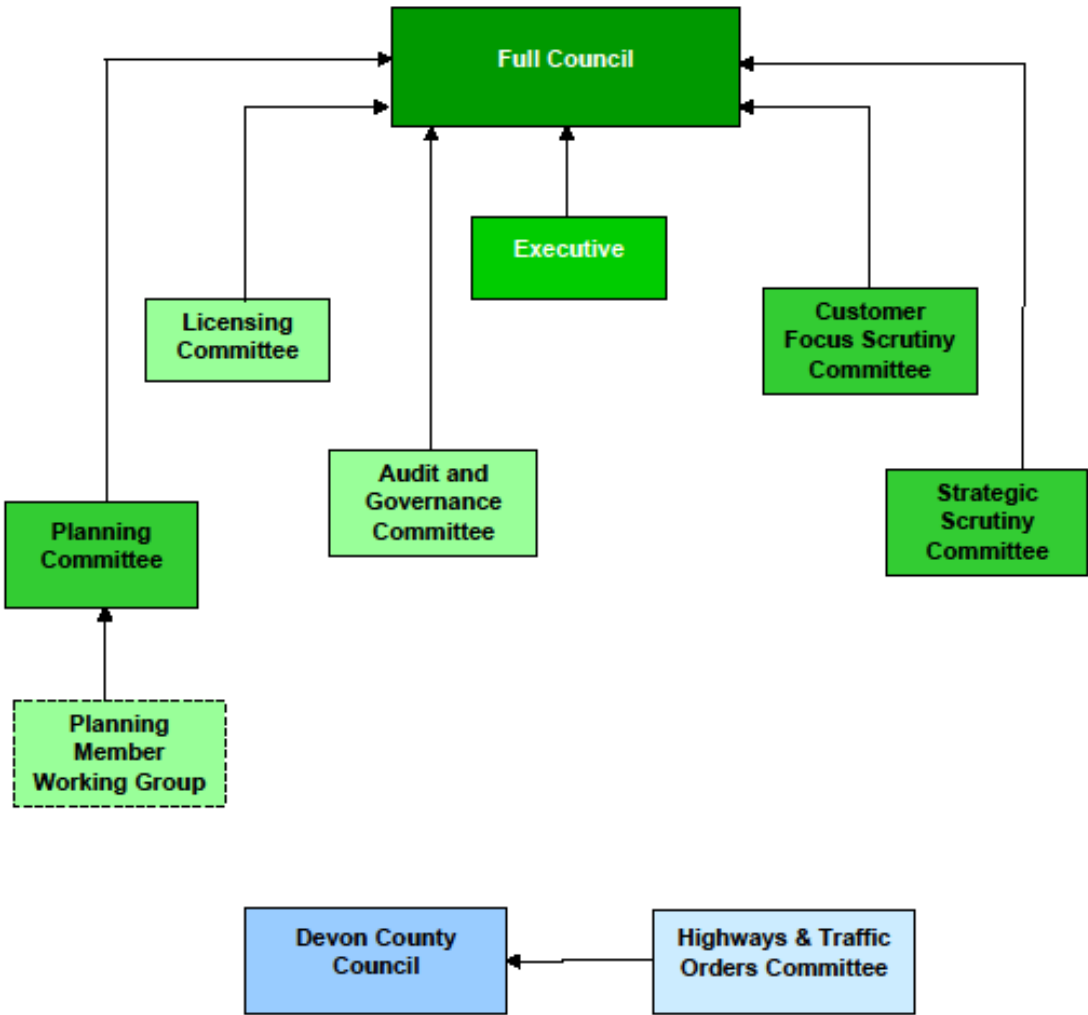
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Appendix B – Committee Structure



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 3 October 2023 Council 17 October 2023	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
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).	Neutral		<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>
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		<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 Lane, Service Lead – Environmental Health and Community Safety

Date: August 2023

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REPORT TO EXECUTIVE

Date of Meeting: 3 October 2023

REPORT TO COUNCIL

Date of Meeting: 17 October 2023

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 2022 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

2.2 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:

5.1 There are no additional financial implications for Council to consider arising from this report.

6. What are the legal aspects?

6.1 Part IV of the Environment Act 1995 (as amended by the Environment Act 2021) 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 PM2.5) 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:

This report is a statutory update report relating to the air quality in the Exeter area. Given that, the Monitoring officer has no comment to make.

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 2022). 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 2022 were significantly lower at 40.4 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. A further fall was seen from 2021 to 2022, back to close to 2020 (lockdown) levels.

8.5 This pattern is partially explained by traffic flows, which fell dramatically in 2020 and rebounded partially in 2021. They increased again in 2022 (Table 3.1 in the Annual Status Report contains data from Devon County Council) but still not back to pre-pandemic levels. It is still too early to say whether traffic flows will eventually 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. Additional variability is also introduced by weather and other factors that affect pollution concentrations on a year to year basis. These factors will continue to be evaluated in future reports, looking at the data from 2023 and beyond.

8.6 No sites had levels in 2022 between 35 and 40 $\mu\text{g}/\text{m}^3$ (i.e. close to but not above the objective level of 40). 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 2022, 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 have 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 but it is likely that trends in travel habits, homeworking etc will continue to evolve. Trends in air quality generally take several years to emerge even when other factors are stable, because of the annual variability caused by weather. What the long term impact of the changes started by 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.

8.10 The annual average EU limit value for $\text{PM}_{2.5}$ is 25 $\mu\text{g}/\text{m}^3$ and there is no suggestion that this level is being exceeded in Exeter. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 introduce a target for national government of 10 $\mu\text{g}/\text{m}^3$ as an annual mean, to be achieved by 2040. Currently it seems likely that large

parts of Exeter meet this level (based on national modelling) but areas close to specific sources may not. The Regulations also introduce a population exposure reduction target for national government; that there is at least a 35% reduction in population exposure by the end of 31st December 2040, as compared with the average population exposure in the three-year period from 1st January 2016 to 31st December 2018.

8.11 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 the Sport England Local Development Pilot.

8.12 The Council has been awarded grant funding from DEFRA in 2023 for a project that aims to provide further information on pollution levels in the Heavitree corridor area, using machine learning, and to disseminate that information to the local community. As this project has only just commenced, detailed information regarding the findings of this project will be presented in next year's annual status report.

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 exceedances.

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 and Alex Bulleid, Senior Environmental Technical Officer

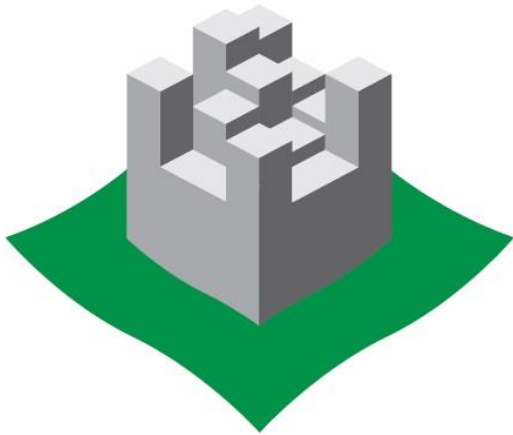
Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

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Exeter
City Council

2023 Air Quality Annual Status Report (ASR)

In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management, as amended by the Environment Act 2021

Date: June, 2023

Exeter City Council

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Report Reference Number	ASR 2022
Date	June 2023

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 29,000 to 43,000 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 2021 the fraction of mortality attributable to particulate air pollution was 5.0%. This is just below the regional figure for the south west (5.1%) and below the national level of 5.5%. Exeter therefore has levels of particulate matter which are causing harm, but this problem is less severe than in 75% the country (Exeter sits on the 25th percentile nationally). 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

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, January 2023

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

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is not generally representative of typical or average conditions across the city. Instead it is indicative of the worst case locations.

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 2022 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 2022 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 rebounded in 2021 but not back to pre-pandemic levels. There was then a further fall in concentrations seen at most sites in 2022. This is likely to have been caused by a combination of traffic flows still being slightly below those seen before Covid, the ongoing improvement in vehicle emissions technologies and measures taken by the City Council and partners to implement the Air Quality Action Plan.

No sites had levels in 2022 between 35 and 40 $\mu\text{g}/\text{m}^3$ (i.e. close to but not above the objective level of 40). 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 2022, 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 very 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 2022 (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 2022) also 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. This makes

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identifying any trend difficult over short periods of time even where other factors are stable.

It seems highly likely that previous exceedences at 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 therefore have been below the objective for 5 years. Other sites (Alphington Street DT19, Livery Dole DT52, Satutory Mount DT54, Fore Street Heavitree inbound DT56 and Honiton Road DT58) were above the objective in 2019 but have not been since. This means that there have now been three years of results at these sites which are below the objective level. However two of these were affected by Covid and lockdowns. The Council does not therefore 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 current objectives for this type of air pollution.

The annual average EU limit value for $\text{PM}_{2.5}$ is $25 \mu\text{g}/\text{m}^3$ and there is no suggestion that this level is being exceeded in Exeter. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 introduce a target for national government of $10 \mu\text{g}/\text{m}^3$ as an annual mean, to be achieved by 2040. Currently it seems likely that large parts of Exeter meet this level (based on national modelling) but areas close to specific sources may not. The Regulations also introduce a population exposure reduction target for national government; that there is at least a 35% reduction in population exposure by the end of 31st December 2040, as compared with the average population exposure in the three-year period from 1st January 2016 to 31st December 2018.

There were no measured exceedences of the PM_{10} air quality objectives in Exeter in 2022. Annual average concentrations rose in 2022 compared to the previous four years. The longer-term trend in annual concentrations is a decline since 2005 or 2006. The data will be monitored over the coming years to identify whether this recent increase is part of an emerging trend or caused by expected inter-annual variability as a result of weather patterns etc.

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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 and Sport England to deliver the measures in this plan.

Actions to Improve Air Quality

Whilst air quality has improved significantly in recent decades, there are some areas where local action is needed to protect people and the environment from the effects of air pollution.

The Environmental Improvement Plan⁵ sets out actions that will drive continued improvements to air quality and to meet the new national interim and long-term PM_{2.5} targets. The National Air Quality Strategy, published in 2023, provides more information on local authorities' responsibilities to work towards these new targets and reduce PM_{2.5} in their areas. The Road to Zero⁶ details the approach to reduce exhaust emissions from road transport through a number of mechanisms; this is extremely 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. Exeter City Council has continued 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. It will also implement walking /

5 Defra. Environmental Improvement Plan 2023, January 2023

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

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cycling improvements as part of Newtown Neighbourhood enhancements, strengthening active travel connections with city centre and rest of the cycle network.

2. 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.
3. Work was completed to construct a large solar array with battery storage at Water Lane by Exeter City Council. This will power a fleet of electric refuse collection vehicles (the first three were delivered in 2022).
4. 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.
5. 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.
6. Three electric refuse collection vehicles joined the Council's fleet in summer 2022.
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, Park Farm, and Exeter Science Park.
8. A new city centre bus station has been delivered providing improved facilities for public transport users in the city.
9. The City Council were 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 were secured for use within the partner organisations, Devon

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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 developing implementation plans and working closely with Exeter City Council to link with the Liveable Exeter sites and Exeter 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. Devon County Council have consulted on the draft Exeter Local Cycling and Walking Infrastructure Plan. The final plan is expected to be published in 2023.
12. DCC have continued their Travel Planning service provided to new residential developments.
13. Work continues on a new station at Marsh Barton to open in spring 2023.
14. The Okehampton railway line has reopened to daily services. This provides a valuable alternative to car travel for people coming into the city from the area north of Dartmoor and increased service frequency from Crediton. An hourly service operated in 2022. 250,000 journeys were made in the first year of operation, far exceeding forecasts. Funding has also been secured through Levelling Up Fund to deliver an additional 'Parkway-style' station, serving wider rural catchment of West Devon, Torridge and North Cornwall for delivery by March 2025.
15. Pop up measures to facilitate social distancing and active travel were introduced in 2020. The changes included the introduction of a new 5km cross city route (E9 Newcourt/Pynes Hill to City centre), supplemented with new crossings (eg at

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Russell Way). Some of these pop-up measures have since been made permanent, such as the road closures and modal filters on Ludwell Lane, Dryden Road and Wonford Road. Work to make the Magdalen Street section permanent commenced in 2022.

16. Permanent school streets have been introduced at Whipton Barton School and Ladysmith School.
17. 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. A decision will be made on an experimental traffic order for the Heavitree area filtered permeability project.
18. A new Park and Change site at the Science Park has been opened. It is currently being used as a Park and Ride for the Nightingale Hospital.
19. 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 2023 with more electric car clubs as part of the Rapid Charging Exeter project.
20. Continued expansion of Co-Bikes (the local on-street e-cycle hire scheme) to now include 26 hire and docking locations.
21. Further development of the cycle network in and around the city, particularly plans for route E4. Detailed design work is underway for the Stoke Hill roundabout and Union Road section. This route will link the new development areas at Monkerton, Tithebarn and Cranbrook with the University. Circa 700m of segregated cycle route on Rifford Road has been approved, which forms part of E12 ('north-south') route and would link the Sweetbrier Lane section through the Wonford area with options to connect into the E9 route or beyond towards the valley park / Exe Estuary.
22. Improved cycle linkages from 'urban fringe settlements' into Exeter cycle network including from Woodbury, from Cranbrook and the Science Park via Langaton Lane and from Ide via Balls Farm Road.
23. A decision has been made to make the reallocation of road space on Queen Street permanent (this creates additional space for cyclists and walkers). Work on site started in 2023. The scheme will create widened pedestrian areas and remove northbound vehicular traffic except for buses and cycles as well as restrict southbound traffic on Iron Bridge. These will collectively remove dominance of vehicles from the city centre streets and create a more attractive environment for active travel. The temporary changes have seen Queen Street traffic flows reduce

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on average by 35%. Iron Bridge traffic flows have reduced by 30% (from 3,700 to 2,600). Cycle flows on Queen Street have increased by 25% and more than doubled on St David's Hill.

24. Bus patronage recovered to some extent from the effect of Covid 19 lockdowns. Devon County Council have obtained £14m of funding (over 3 years) for its Bus Service Improvement Plan across the County. This includes plans for improving bus priority on Cowick Street, Pinhoe Road, Heavitree Road and the New North Road approach to the city centre (avoiding Longbrook Street route).
25. Pinhoe Station interchange has been delivered, with a shuttle bus alongside bike lockers and a new car park to provide an integrated rail hub, linking passengers arriving at Pinhoe to the Science Park, SkyPark, Exeter Gateway logistics park and Exeter Airport.

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

- DEFRA grant funding has been obtained for a project to develop a model of pollution concentrations in the Heavitree corridor which will provide better spatial and temporal resolution than the current monitoring. This will be overlaid with health information, enabling more informed choices by the travelling public.
- Further refinement of the net zero plan for Exeter.
- 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.
- Publication of the Exeter Local Cycling and Walking Infrastructure Plan following consultation in 22/23.
- 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.
- All new vehicles entering the Council's fleet are likely to be electric (unless operational requirements make this impossible).

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- A decision will be made on an experimental traffic order for the Heavitree area filtered permeability project.
- Marsh Barton station to be opened.
- 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 travel by bike.
- The works to make changes to the cycle provision on Magdalen Road permanent will be completed 22/23.
- £14m of funding (over 3yrs) has been received by Devon County Council for its Bus Service Improvement Plan across the County.
- The Council have received a grant to replace gas boilers with heat pumps at the RAMM and the Riverside leisure centre in a two year project to be completed by April 2025. This will reduce NOx emissions from the old boilers.
- A new Exeter City Council Electric Vehicle Strategy, due to be launched July 2023
- The City Council's car parking will be reviewed during 2023, for implementation in 2024. Changes could include:
 - Introduction of an emissions levy, where diesel and petrol cars pay a small levy when parking in an off-street car park. Income generated would be ring fenced for net zero type activity.
 - Residential bike storage installed in off-street car parks located near residential areas.
 - Review weekend parking, to avoid peak usage on a Saturday.
 - Review off-street parking, to utilise spare capacity to develop mobility hubs, last mile delivery and parcel lockers.

Conclusions and Priorities

Nitrogen dioxide levels in Exeter in 2022 were generally below those measured in 2021 and well below pre-pandemic concentrations such that only one location was above the objective (East Wonford Hill). Trends will be monitored over the coming years to identify

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whether the area of exceedance remains small or whether further post-Covid rebound in traffic might cause an increase in levels during 2023. Exeter City Council does not intend to review the AQMA order or AQMA boundary until 2024 when the current AQAP expires. Before this date action to improve air quality will continue to be focussed on those small 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 are below the current objective level and PM₁₀ concentrations have shown a general decline since 2006.

The priorities and challenges for 2023 are to implement the DEFRA Air Quality Grant project, 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 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.

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.

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 & Community Safety Department of Exeter City Council with the support and agreement of the following officers and departments:

Exeter City Council - City Development

Exeter City Council

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 the Devon County Council Director of Public Health.

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

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1 Local Air Quality Management

This report provides an overview of air quality in Exeter during 2022. It fulfils the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995), as amended by the Environment Act (2021), 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 order to achieve and maintain the objectives and the dates by which each measure will be carried out. This Annual Status Report (ASR) is an annual requirement showing the strategies employed by Exeter City Council 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 18 months. The AQAP should specify how air quality targets will be achieved and maintained, and provide dates by which measures will be carried out.

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.

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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 Highways England?	Level of Exceedance: Declaration	Level of Exceedance: Current Year	Number of Years Compliant with Air Quality Objective	Name and Date of AQAP Publication	Web Link to AQAP
Exeter AQMA	Declared 2007, Amended 2011	NO ₂ Annual Mean	An area encompassing the radial routes into the city and other major routes	NO	70 µg/m ³	40.6 µg/m ³	N/A	Exeter AQAP 2019-2024	www.exeter.gov.uk/airpollution
Exeter AQMA	Declared 2007, Amended 2011	NO ₂ 1 Hour Mean	An area encompassing the radial routes into the city and other major routes	NO	65 µg/m ³	N/A	4 years	Exeter AQAP 2019-2024	www.exeter.gov.uk/airpollution

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- 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:

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.

Exeter City Council has taken forward a number of direct measures during the current reporting year of 2022 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 have made during the reporting year of 2022 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 continued 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

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Health & Wellbeing Centre to include a cycling hub on Exeter's Green Circle and family activity trails around the Ludwell valley. It will also implement walking / cycling improvements as part of Newtown Neighbourhood enhancements, strengthening active travel connections with city centre and rest of the cycle network.

2. 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.
3. Work was completed to construct a large solar array with battery storage at Water Lane by Exeter City Council. This will power a fleet of electric refuse collection vehicles (the first three were delivered in 2022).
4. 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.
5. 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.
6. Three electric refuse collection vehicles joined the Council's fleet in summer 2022.
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, Park Farm, and Exeter Science Park.
8. A new city centre bus station has been delivered providing improved facilities for public transport users in the city.
9. The City Council were partners with Devon County Council and Co Delivery in a scheme which secured an £80,000 grant from the Department for Transport Energy

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Saving Trust to expand the capabilities of e-cargo bikes for business travel. Nine electric cargo bikes were 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 developing implementation plans and working closely with Exeter City Council to link with the Liveable Exeter sites and Exeter 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. Devon County Council have consulted on the draft Exeter Local Cycling and Walking Infrastructure Plan. The final plan is expected to be published in 2023.
12. DCC have continued their Travel Planning service provided to new residential developments.
13. Work continues on a new station at Marsh Barton to open in spring 2023.
14. The Okehampton railway line has reopened to daily services. This provides a valuable alternative to car travel for people coming into the city from the area north of Dartmoor and increased service frequency from Crediton. An hourly service operated in 2022. 250,000 journeys were made in the first year of operation, far exceeding forecasts. Funding has also been secured through Levelling Up Fund to deliver an additional 'Parkway-style' station, serving wider rural catchment of West Devon, Torridge and North Cornwall for delivery by March 2025.

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15. Pop up measures to facilitate social distancing and active travel were introduced in 2020. The changes included 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 since been made permanent, such as the road closures and modal filters on Ludwell Lane, Dryden Road and Wonford Road. Work to make the Magdalen Street section permanent commenced in 2022.
16. Permanent school streets have been introduced at Whipton Barton School and Ladysmith School.
17. 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. A decision will be made on an experimental traffic order for the Heavitree area filtered permeability project.
18. A new Park and Change site at the Science Park has been opened. It is currently being used as a Park and Ride for the Nightingale Hospital.
19. 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 2023 with more electric car clubs as part of the Rapid Charging Exeter project.
20. Continued expansion of Co-Bikes (the local on-street e-cycle hire scheme) to now include 26 hire and docking locations.
21. Further development of the cycle network in and around the city, particularly plans for route E4. Detailed design work is underway for the Stoke Hill roundabout and Union Road section. This route will link the new development areas at Monkerton, Tithebarn and Cranbrook with the University. Circa 700m of segregated cycle route on Rifford Road has been approved, which forms part of E12 ('north-south') route and would link the Sweetbrier Lane section through the Wonford area with options to connect into the E9 route or beyond towards the valley park / Exe Estuary.
22. Improved cycle linkages from 'urban fringe settlements' into Exeter cycle network including from Woodbury, from Cranbrook and the Science Park via Langaton Lane and from Ide via Balls Farm Road.
23. A decision has been made to make the reallocation of road space on Queen Street permanent (this creates additional space for cyclists and walkers). Work on site started in 2023. The scheme will create widened pedestrian areas and remove northbound vehicular traffic except for buses and cycles as well as restrict

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southbound traffic on Iron Bridge. These will collectively remove dominance of vehicles from the city centre streets and create a more attractive environment for active travel. The temporary changes have seen Queen Street traffic flows reduce on average by 35%. Iron Bridge traffic flows have reduced by 30% (from 3,700 to 2,600). Cycle flows on Queen Street have increased by 25% and more than doubled on St David's Hill.

24. Bus patronage recovered to some extent from the effect of Covid 19 lockdowns. Devon County Council have obtained £14m of funding (over 3 years) for its Bus Service Improvement Plan across the County. This includes plans for improving bus priority on Cowick Street, Pinhoe Road, Heavitree Road and the New North Road approach to the city centre (avoiding Longbrook Street route).
25. Pinhoe Station interchange has been delivered, with a shuttle bus alongside bike lockers and a new car park to provide an integrated rail hub, linking passengers arriving at Pinhoe to the Science Park, SkyPark, Exeter Gateway logistics park and Exeter Airport.

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

- DEFRA grant funding has been obtained for a project to develop a model of pollution concentrations in the Heavitree corridor which will provide better spatial and temporal resolution than the current monitoring. This will be overlaid with health information, enabling more informed choices by the travelling public.
- Further refinement of the net zero plan for Exeter.
- 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.
- Publication of the Exeter Local Cycling and Walking Infrastructure Plan following consultation in 22/23.
- 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.

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- Work to enable the delivery of a Water Lane low traffic neighbourhood through redevelopment of brownfield land.
- All new vehicles entering the Council's fleet are likely to be electric (unless operational requirements make this impossible).
- A decision will be made on an experimental traffic order for the Heavitree area filtered permeability project.
- Marsh Barton station to be opened.
- 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 travel by bike.
- The works to make changes to the cycle provision on Magdalen Road permanent will be completed 22/23.
- £14m of funding (over 3yrs) has been received by Devon County Council for its Bus Service Improvement Plan across the County.
- The Council have received a grant to replace gas boilers with heat pumps at the RAMM and the Riverside leisure centre in a two year project to be completed by April 2025. This will reduce NOx emissions from the old boilers.
- A new Exeter City Council Electric Vehicle Strategy, due to be launched July 2023
- The City Council's car parking will be reviewed during 2023, for implementation in 2024. Changes could include:
 - Introduction of an emissions levy, where diesel and petrol cars pay a small levy when parking in an off-street car park. Income generated would be ring fenced for net zero type activity.
 - Residential bike storage installed in off-street car parks located near residential areas.
 - Review weekend parking, to avoid peak usage on a Saturday.
 - Review off-street parking, to utilise spare capacity to develop mobility hubs, last mile delivery and parcel lockers.

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.

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

- Neighbouring authorities
- Devon County Council
- Sport England

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 because the Greater Exeter Strategic (GESP) Plan is no longer being progressed. The Exeter Plan will shape the future of Exeter for the next 20 years, to 2040, and will be the basis for how the city continues to evolve and meet the needs of the community. The Exeter Plan is the new name for the Local Plan. It will be the main planning document for Exeter, setting out where development should take place and providing the policies which will be used in making decisions on planning applications.
- Bus patronage has not fully recovered to pre pandemic levels. 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. Passenger numbers improved slightly in 21/22 but whole year figures were below what would otherwise have been expected at just below 15 million. The future of public transport and the measures needed to encourage passengers back safely will be considered in 2023 and beyond in Devon County Council's Bus Service Improvement Plan.

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Exeter City Council anticipates that the measures stated above and in Table 2.2 will achieve compliance in the Exeter AQMA although the impact of financial pressures on local authorities is always uncertain. 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 2024 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 in AQAP	Estimated / Actual Completion Date	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	2024	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 measures introduced in 2020, including a new 5km cross city route (E9 Newcourt/Pynes Hill to City centre), have been made permanent with road closures and modal filters on Ludwell Lane, Dryden Road and Wonford Road. Work to make the Magdalen Street section permanent commenced on site in 2022. School streets introduced at Whipton Barton School and Ladysmith School. Filtered permeability plans for the whole Heavitree area are under development with some elements delivered (modal filter on Homefield Road and contra-flow cycle lane on Park Place). A decision will be made on an experimental traffic order for the Heavitree area filtered permeability project. 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.

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	2024	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 is being made permanent. 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 consulted on in 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.
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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 delivered as part of residential development in area. Park and Change at Science Park opened. Okehampton line reopened for daily travel and new station being delivered at Marsh Barton. Funding obtained to deliver a new cycle link between Woodbury and Exe Estuary Trail. Modal filter on Langaton Lane approved for construction, delivering quiet lane link between Pinhoe area, Exeter Science Park and wider East Devon strategic employment sites. Balls Farm Road modal filter near Alphington approved and constructed to improve quiet lane linkages between Ide and Exeter. Plans currently being developed for improving bus priority on Cowick Street corridor and New North Road approach to city centre, to be followed by plans for Pinhoe Road and Heavitree corridor.	Consultation and obtaining relevant permissions, consents and traffic orders as well as bringing together necessary funding
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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	2024	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	Changes to parking across Exeter were introduced in 2023, some of the changes are to discourage visitors, shoppers and commuters from parking in the city centre	The need to balance action against any real or perceived impact on local businesses.
5	Maximise efficiency of existing highway network	Transport Planning and Infrastructure	Other	2019	2024	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	2024	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 (Stoke Hill roundabout and Union Road sections are next to be delivered) and E9 route made permanent. C.700m of segregated cycle route on Rifford Road will be delivered forming part of E12 ('north-south') route. The LCWIP document was released for public consultation 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	2024	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 new SELDP local Physical Activity Organisers delivered play street 'non car events'	Plans will be developed in individual areas with local communities.
8 (amber measure)	Use social prescribing and community building to help individuals get and stay active	Public Information	Other	2019	2024	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	2024	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	2024	ECC via Sport England Local Delivery Pilot & Exeter City Futures	ECC via existing internal budgets, Sport England Local Delivery Pilot & Exeter City Futures	YES	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.		DEFRA grant funding obtained for project to develop air quality information and communications specific to the Heavitree area. Communications strategy also 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	
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	2024	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	2024	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. Devon County Council's Bus Service Improvement Plan will deliver improved services and access across the County	Dependent on funding availability and future demand for public transport.
13	Developers to mitigate the effects of their development on air quality	Policy Guidance and Development Control	Other policy	2019	2024	ECC via the Exeter Plan	Within existing ECC resources	NO	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	Until the Exeter Plan is published, officers will be implementing current policy in a robust manner eg when considering retail park applications and new housing.	The AQAP originally envisaged that this would be delivered by the GESP. However the GESP is no longer being progressed. The Exeter Plan will shape the future of Exeter to 2040, and will be the basis for how the city continues to evolve and meet the needs of the community. It will be the main planning document for Exeter, setting out where development should take place and providing the policies which will be used in making decisions on planning applications.

14	Policies deliver development where private car use is not the only realistic travel choice	Policy Guidance and Development Control	Other policy	2019	2024	ECC via the Exeter Plan	Within existing ECC resources	NO	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. Until the Exeter Plan is published, officers will be implementing current policy in a robust manner eg when considering retail park applications and new housing.	Work on the Liveable Exeter project continues alongside the Exeter Plan (this has replaced the GESP which may have resulted in some delay from when the AQAP was published). (see measure 13).
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	2024	ECC, BID, DCC and developers	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	2024	ECC	Internal ECC budgets	YES	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.		DEFRA grant funding obtained for project to develop air quality information and communications specific to the Heavitree area. Baseline evidence report completed subject to annual review following publication of each year's measurement data and any new research, national guidance etc.	

17	An air pollution monitoring network that supports the measures in this action plan	Public Information	Other	2019	2024	ECC	Internal ECC budgets or grant funding if available	YES	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. DEFRA grant funding obtained for project to develop air quality information and communications specific to the Heavitree area which includes use of new sensor technologies.
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PM_{2.5} – Local Authority Approach to Reducing Emissions and/or Concentrations

As detailed in Policy Guidance LAQM.PG22 (Chapter 8), 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 2021 the fraction of mortality attributable to particulate air pollution was 5.0%. This is just below the regional figure for the south west (5.1%) and below the national level of 5.5%. Exeter therefore has levels of particulate matter which are causing harm, but this problem is less severe than in 75% the country (Exeter sits on the 25th percentile nationally). The data is available at [this link](#).

There is now a capacity for direct monitoring of PM_{2.5} in Exeter, since August 2018, at two roadside sites. This showed PM_{2.5} concentrations of 12.7 µg/m³ at RAMM and 8.9 µg/m³ at Alphington Street in 2022. National modelling by PHE (available via the website above) suggests that for 2021 (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. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 introduce a target for national government of 10 µg/m³ as an annual mean, to be achieved by 2040. Currently it seems likely that large parts of Exeter meet this level (based on the national modelling described above) but areas close to specific sources may not. The Regulations also introduce a population exposure reduction target for national government; that there is at least a 35% reduction in population exposure by the end of 31st December 2040, as compared with the average population exposure in the three-year period from 1st January 2016 to 31st December 2018.

Despite these being targets for central government, Exeter City Council still has a duty to reduce emissions of and exposure to this pollutant. During 2023, Exeter City Council will be taking the measures described in Table 2.2 that will address PM_{2.5} as well as NO₂.

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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 2022 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 2018 and 2022 to allow monitoring 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 2022. 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 84 sites during 2022. 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. 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.

3.1.3 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 data ratification, 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 2022 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 local bias adjustment figure (0.77) has been used this year. Data capture at the Exeter Roadside (CM1) continuous analyser was good, as were the co-located diffusion tubes precision and bias (Appendix C.3). The national bias factor (0.83) is higher than the local one so if that had been used the final reported concentrations would have been slightly higher. 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 2022 (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 (40.4 µg/m³ against an objective of 40). This is within the Exeter AQMA. The general trend in the data for all the monitoring sites is a significant fall in concentrations between 2019 and 2020 with a partial rebound in 2021 and then a further fall in 2022 (see Figure A.1 and the data in

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Table A.4). This can be attributed to changes in traffic flows as a result of COVID-19 and new travel & working behaviours (see table 15.1) as well as ongoing improvements in vehicle emission technologies and the impact of measures in the Air Quality Action Plan.

Table 3.1 Traffic Flow Data (24 hour average)

Site Name	2015	2020	2021	2022	% change from 2015 to 2020	% change from 2015 to 2021	% change from 2015 to 2022
Pinhoe Road (Whipton)	20830	16538	17,218	20,346	-21%	-17%	-2%
Heavitree Road	17507	14832	16,632	18,109	-15%	-5%	3%
Honiton Road	26832	22789	23,936	25,503	-15%	-11%	-5%
Topsham Road (King George)	26057	20702	23,635	24,445	-21%	-9%	-6%
Alphington St	28799	22012	23,401	25,537	-24%	-19%	-11%
Cowick St	14840	10913	11,916	12,530	-26%	-20%	-16%
Total	134865	107786	116,738	126,470	-20%	-13%	-6%

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 2022) 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.

It seems highly likely that previous exceedences at 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 5 years. Other sites (Alphington Street DT19, Livery Dole DT52, Satutory Mount DT54, Fore Street Heavitree inbound DT56 and Honiton Road DT58) were above the objective in 2019 but have not been since. This means that there have now been three years of results that are below the objective level. However two of these were affected by Covid and lockdowns. The Council does not therefore intend to review the AQMA order or AQMA boundary until 2024 when the current AQAP expires. Before this date action to improve air quality will continue to be focussed on those small areas within the AQMA where exceedences have been measured recently (East Wonford Hill). A complete review will commence in 2024

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together with the necessary reports and consultation for an amended AQMA (if required) and subsequently a new AQAP.

There was one change to the monitoring network in 2022. This was the addition of a diffusion tube at Bonhay Road (DT85). This is beside a road where traffic sometimes queues and below a railway over-bridge. It is a location where traffic flows might increase as a result of vehicles displaced from the city centre by changes to Queen Street. It was included to monitor trends, rather than to identify any expected exceedence of the objective.

No further changes to the monitoring network are planned for 2023. 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.

3.1.4 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 2022. Data capture at CM1 (RAMM) was below 75% (because of equipment breakdowns) and therefore annualisation was required. Annual average concentrations rose in 2022 compared to the previous four years. The longer-term trend in annual concentrations is a decline since 2005 or 2006. The data will be monitored over the coming years to identify whether this recent increase is part of an emerging trend or caused by expected inter-annual variability as a result of weather patterns etc.

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There were two exceedences of an hourly mean of $50\mu\text{g}/\text{m}^3$ in 2022 at RAMM. The 90.4th percentile of hourly results has also been calculated because of the low data capture. This is below $50\mu\text{g}/\text{m}^3$. No hourly levels at CM2 (Alphington Street) were over $50\mu\text{g}/\text{m}^3$.

3.1.5 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 2022. Data capture at CM1 (RAMM) was below 90% and therefore annualisation was required. There is no obvious trend in concentrations over the period when data has been collected.

3.1.6 Ozone (O₃)

Table A.9 in Appendix A compares the ratified ratified continuous monitored O₃ 8-hour mean concentrations for the past 5 years with the air quality objective of $100\mu\text{g}/\text{m}^3$, 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 2022 with the nationally applied air quality objective for this pollutant. 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 2022. 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 AQMA 1	Chemiluminescent; UVA; Optical Light Scattering	0	1	1.7
CM2	Alphington Street	Roadside	291670	91773	PM ₁₀ ; PM _{2.5}	YES AQMA 1	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
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

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)
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
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

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)
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
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

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)
DT52	Livery Dole	Roadside	293418	92497	NO2	YES, Exeter AQMA	0.0	1.5	No	1.7
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
DT66	Topsham Road (Tollards Road)	Roadside	294227	90435	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)
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
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

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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)
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
DT85	Bonhay Road Bridge	Kerbside	291375	92935	NO2	YES, Exeter AQMA	2.0	2.0	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.

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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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
CM1	291939	92830	Kerbside		97.2	29.1	29	18.8	19.2	17.9

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22.

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.TG22 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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
DT1	292199	92814	Kerbside		100.0	29.2	26.5	17.0	20.9	15.8
DT2	292315	93016	Kerbside		100.0	25.2	26.4	17.5	21.4	19.2
DT3	292185	93049	Kerbside		92.3	25.9	27.8	18.8	22.6	20.3
DT4	291779	93011	Kerbside		92.3	23.1	23.8	16.2	19.0	16.7
DT5, DT6	291944	92826	Kerbside		90.4	29.3	27.5	18.5	21.3	17.9
DT7	291984	92626	Roadside		100.0	26.0	22.6	15.7	20.4	18.2
DT8	291895	92569	Kerbside		92.0	33.9	35.7	22.6	27.9	24.1
DT9	291943	92511	Roadside		100.0	29.1	28.5	18.7	24.2	20.7
DT10	291833	92433	Kerbside		100.0	30.8	29.5	18.6	23.4	20.9
DT11	292291	92292	Kerbside		100.0	29.4	28.9	19.5	24.7	22.7
DT12	292422	92320	Kerbside		92.3	31.1	29.3	20.0	23.8	23.1
DT13	292590	92743	Roadside		100.0	21.6	19.6	13.2	16.8	15.3
DT14	292832	92731	Roadside		100.0	20.3	19.0	13.2	16.5	14.7

Exeter City Council

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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
DT15	292703	92807	Kerbside		92.0	34.5	31.4	22.3	28.0	24.1
DT16	292378	92039	Kerbside		100.0	34.2	29.3	21.3	26.6	22.1
DT17	291699	92091	Roadside		100.0	22.4	21.4	15.5	18.3	15.8
DT18	291657	91973	Roadside		100.0	22.3	22.7	15.8	19.2	17.6
DT19	291669	91812	Kerbside		100.0	47.0	42.0	28.5	35.7	33.4
DT20	291532	91349	Roadside		100.0	33.6	31.3	22.4	27.4	24.5
DT21	291460	91390	Urban Background		100.0	15.3	12.7	9.1	11.7	10.2
DT22	291509	91151	Roadside		90.4	29.0	26.2	17.7	21.2	20.8
DT23	291518	90813	Roadside		100.0	27.3	23.4	15.3	20.6	18.8
DT24	291691	90425	Roadside		100.0	28.0	23.4	18.3	24.3	18.6
DT25	291767	90160	Kerbside		100.0	26.1	23.5	16.2	19.8	21.1
DT26	291520	90531	Roadside		90.7	31.3	30.2	20.4	25.6	22.6
DT27	290864	91725	Kerbside		100.0	39.9	38.7	26.8	31.6	30.3
DT28	291249	91874	Roadside		100.0	23.9	21.1	15.6	19.9	17.6

Exeter City Council

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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
DT29	291376	91944	Roadside		100.0	43.4	34.4	24.3	29.8	28.9
DT30	291500	92055	Roadside		72.8	33.2	30.1	22.1	28.2	26.9
DT31	291351	92169	Roadside		100.0	25.2	24.3	17.3	20.6	18.9
DT32	290826	93598	Roadside		100.0	25.4	25.4	17.7	21.2	20.5
DT33	291253	93299	Roadside		100.0	30.9	26.8	19.2	24.7	22.0
DT34	291242	93483	Kerbside		90.4	38.3	36.0	26.5	32.1	29.9
DT35	291272	93468	Kerbside		92.3	31.4	31.1	21.5	26.0	23.2
DT36	291054	94399	Roadside		100.0	33.8	32.5	22.9	27.5	26.6
DT37	292391	93291	Roadside		100.0	28.6	28.4	18.3	23.2	21.8
DT38	292469	93245	Roadside		92.3	29.7	27.7	18.1	23.0	20.9
DT39	292579	93146	Kerbside		92.3	38.9	36.2	23.3	31.2	28.0
DT40	293047	93877	Roadside		100.0	28.0	26.4	16.7	21.0	19.4
DT41	293405	93395	Roadside		100.0	31.2	29.8	20.9	24.0	22.5
DT42	293251	93375	Kerbside		83.0	37.2	35.9	25.6	30.6	28.2

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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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
DT43	293227	93356	Roadside		100.0	28.2	25.7	19.2	23.5	20.8
DT44	295068	94487	Kerbside		100.0	20.3	17.8	13.6	15.1	13.7
DT45	295888	94101	Kerbside		100.0	19.1	18.0	14.2	16.6	15.4
DT46	296418	94470	Kerbside		92.3	24.8	23.1	18.4	21.8	18.8
DT47	296984	94327	Urban Background		92.3	18.7	17.9	13.3	15.1	12.8
DT48	296494	93782	Roadside		100.0	19.3	17.6	12.8	15.5	14.4
DT49	295413	93689	Roadside		100.0	19.7	17.9	12.6	15.8	16.0
DT50	293091	92825	Urban Background		100.0	14.5	14.0	9.7	11.6	10.5
DT51	293448	92419	Kerbside		100.0	39.7	35.5	24.3	29.4	27.8
DT52	293418	92497	Roadside		100.0	48.7	42.6	31.1	34.9	32.5
DT53	293533	92473	Kerbside		100.0	46.4	38.5	27.4	32.1	27.4
DT54	293738	92396	Roadside		100.0	53.6	43.4	32.7	37.3	33.8
DT55	293781	92409	Roadside		100.0	31.2	26.7	19.8	23.4	20.8
DT56	294043	92359	Roadside		100.0	43.4	40.3	29.0	32.2	30.8

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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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
DT57	294410	92310	Roadside		100.0	<u>61.9</u>	53.5	38.2	42.2	40.6
DT58	295203	92378	Roadside		100.0	50.6	47.3	33.2	35.4	31.9
DT59	295191	92395	Roadside		100.0	24.5	20.4	14.8	16.0	15.0
DT60	295466	92365	Roadside		100.0	37.0	30.7	23.5	26.8	25.2
DT61	295636	92232	Roadside		100.0	24.2	21.8	15.5	19.2	17.6
DT62	295710	90571	Roadside		100.0	19.2	16.3	11.5	14.7	13.7
DT63	294694	90001	Roadside		83.0	27.0	25.4	18.1	20.7	17.5
DT64	294652	89974	Roadside		100.0	22.6	20.6	17.8	16.9	15.7
DT65	296415	88477	Kerbside		100.0	27.9	24.4	17.2	22.1	18.8
DT66	294227	90435	Roadside		100.0	39.7	36.4	25.0	30.0	28.1
DT67	293213	91245	Roadside		100.0	25.6	21.5	15.9	19.1	19.3
DT68	292291	91678	Urban Background		100.0	13.7	13.8	9.4	11.7	10.0
DT69	291016	91304	Urban Background		100.0	11.5	11.2	7.6	9.3	8.9
DT70	291298	92593	Urban Background		100.0	17.5	16.1	12.3	15.9	14.0

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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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
DT71	294387	92611	Urban Background		66.8	11.2	10.5	7.6	9.1	8.8
DT72	293617	93090	Roadside		92.3		14.2	10.6	12.2	10.6
DT73	293052	94185	Urban Background		100.0		10.2	7.5	8.3	7.9
DT74	292056	93043	Urban Background		47.5		11.4	8.3	10.7	8.4
DT75	291721	89727	Roadside		100.0		15.8	11.1	13.7	12.7
DT76	291555	90449	Urban Background		92.3		14.7	9.6	12.3	11.3
DT77	292553	93082	Kerbside		100.0		31.1	18.6	23.8	20.6
DT78	296415	94165	Other		92.3		15.1	10.6	13.4	12.6
DT79	296827	93886	Roadside		100.0		19.5	14.5	17.3	15.5
DT80	295967	88876	Roadside		100.0		19.8	14.3	16.4	16.7
DT81	292637	91991	Roadside		100.0		15.6	11.2	13.9	12.2
DT82	292847	92911	Urban Background		100.0			10.8	12.6	12.1
DT83	291655	92258	Roadside		80.8			19.5	24.0	22.6
DT84	291897	92217	Roadside		100.0			15.5	18.6	15.5

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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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
DT85	291375	92935	Kerbside		100.0					27.1

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22.

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**.

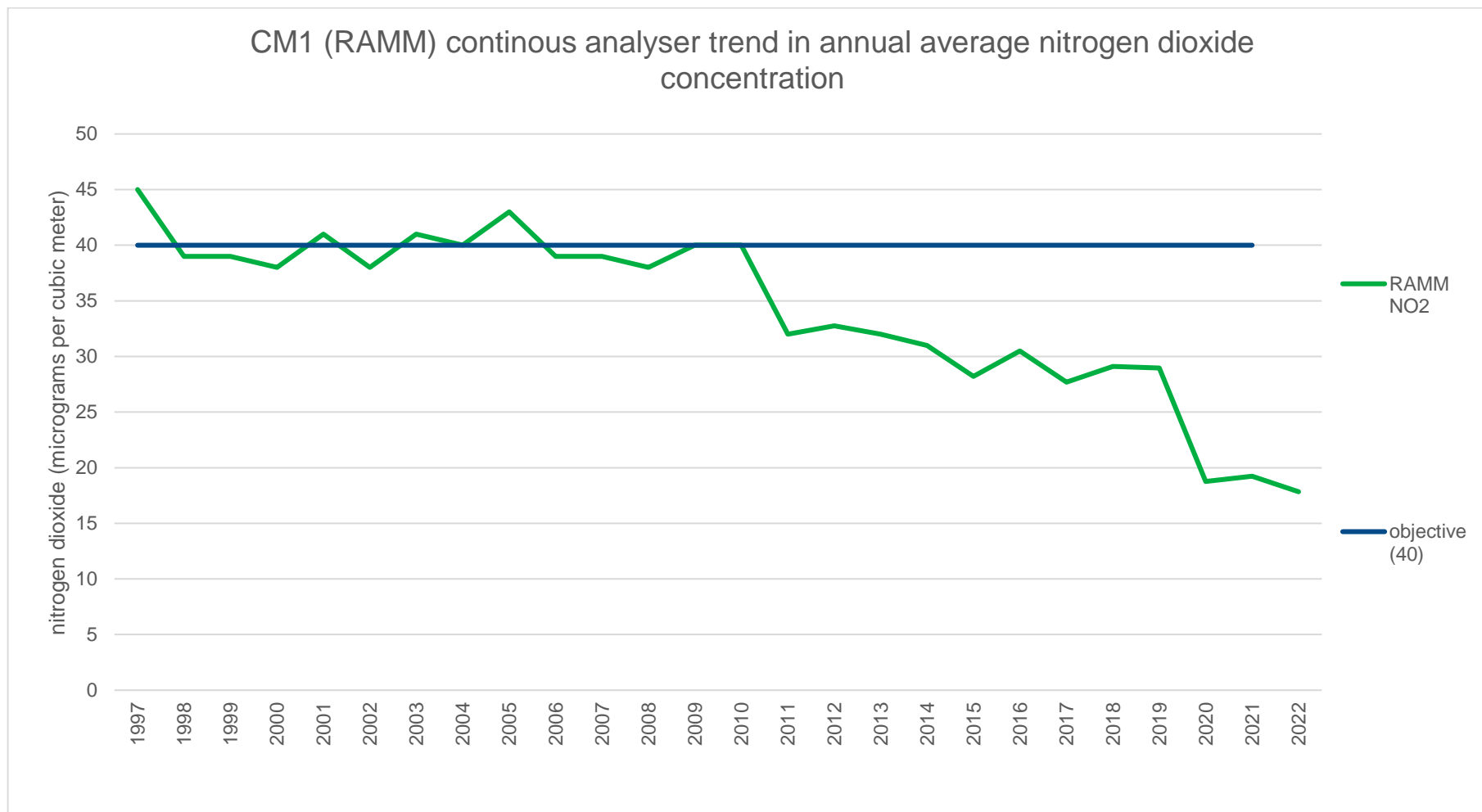
Means for diffusion tubes have been corrected for bias. All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

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

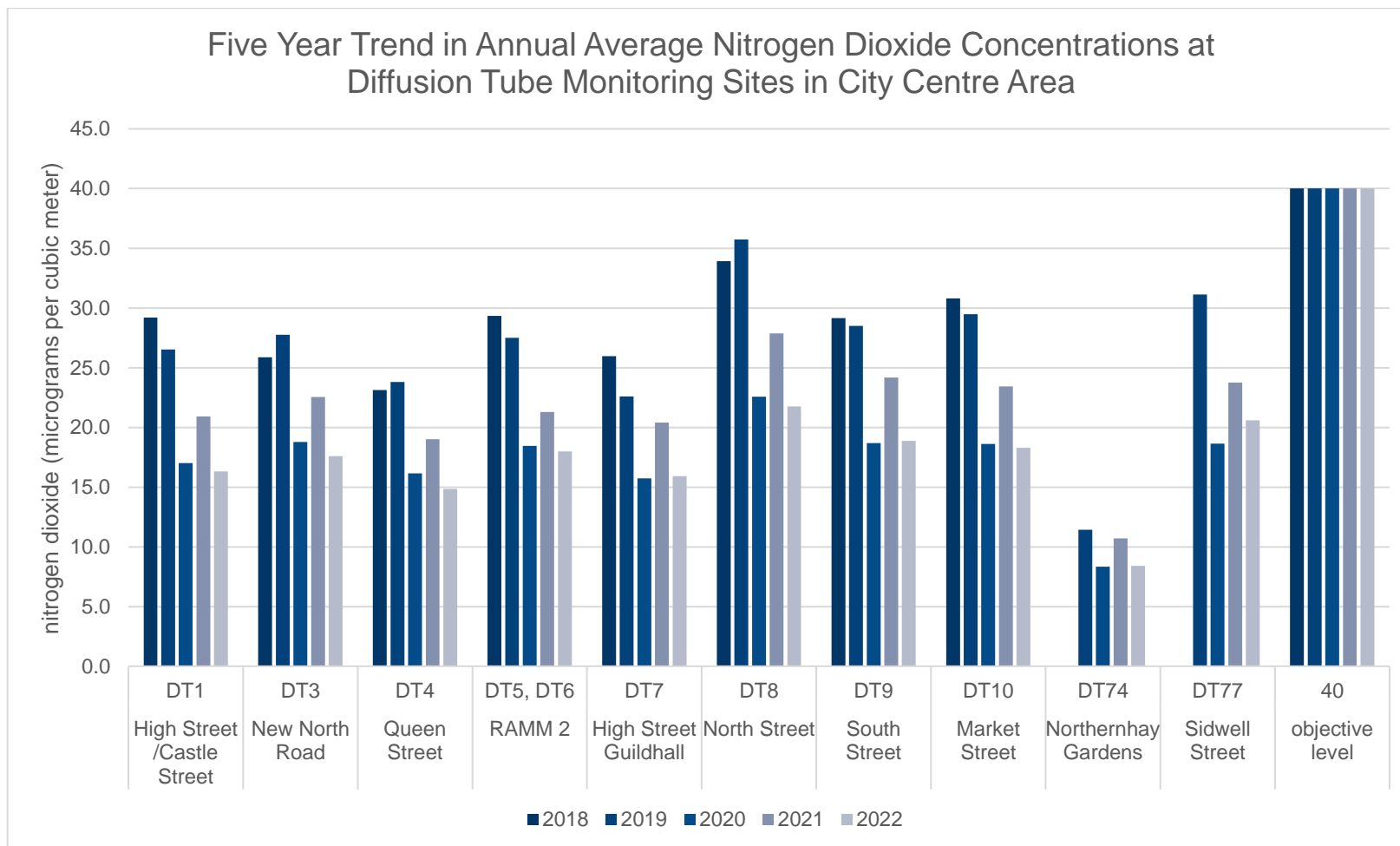
(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(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%).

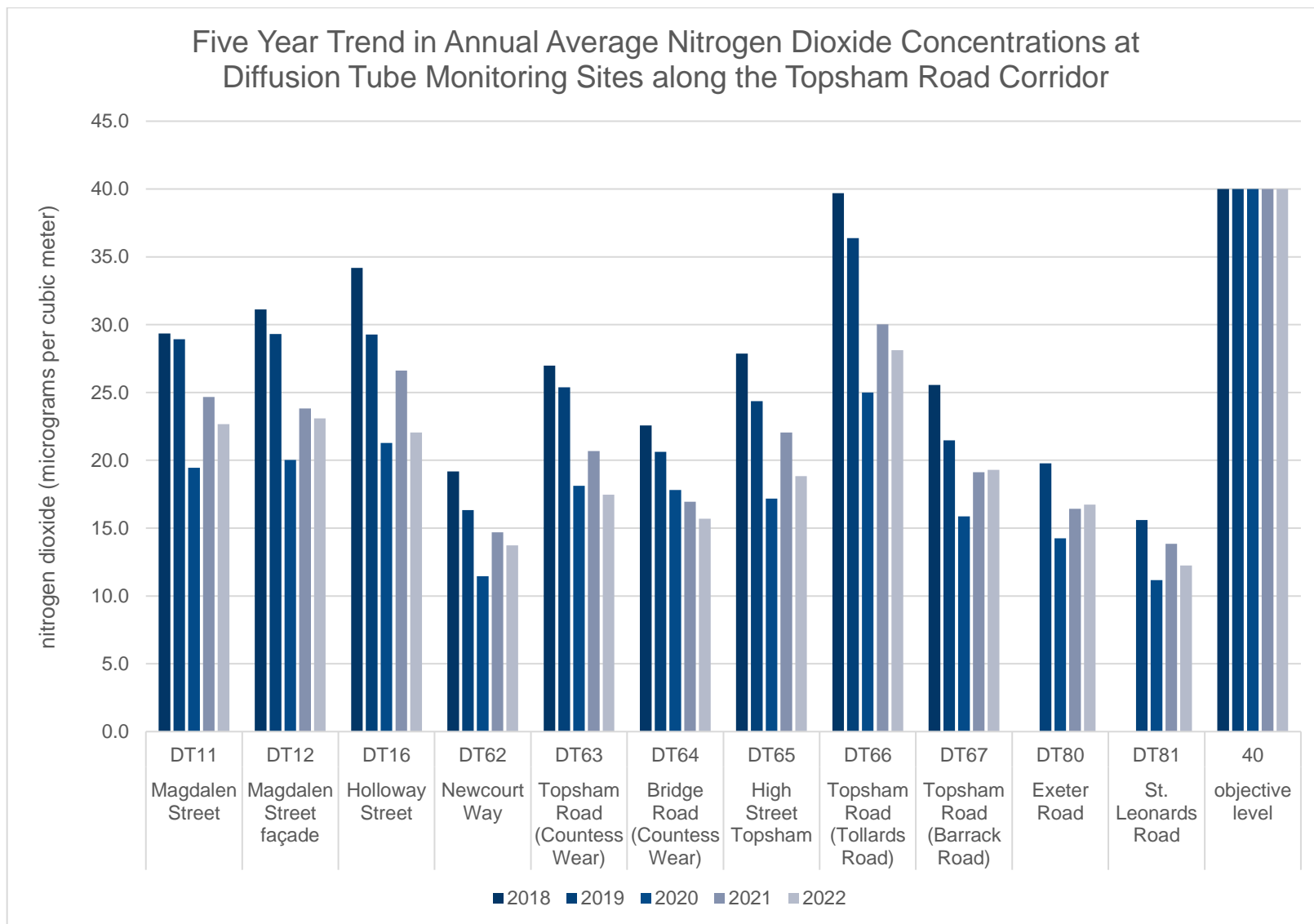
Figure A.1 – Trends in Annual Mean NO₂ Concentrations



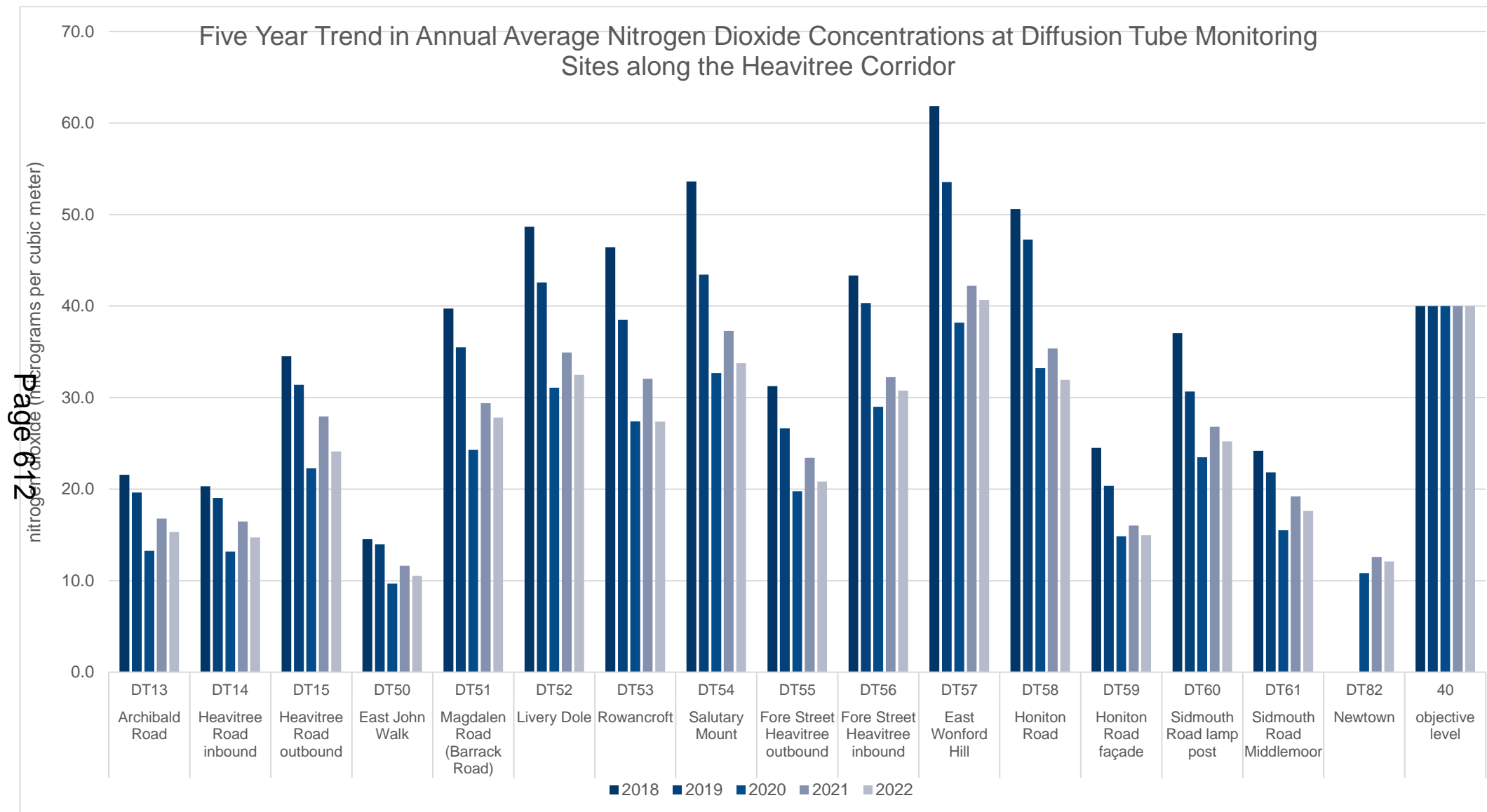
This figure presents NO₂ annual mean concentrations at the RAMM continuous monitoring site between years 1997 and 2022. There are no exceedances of the annual mean objective in 2022. There is a general trend of reduction since 2010.



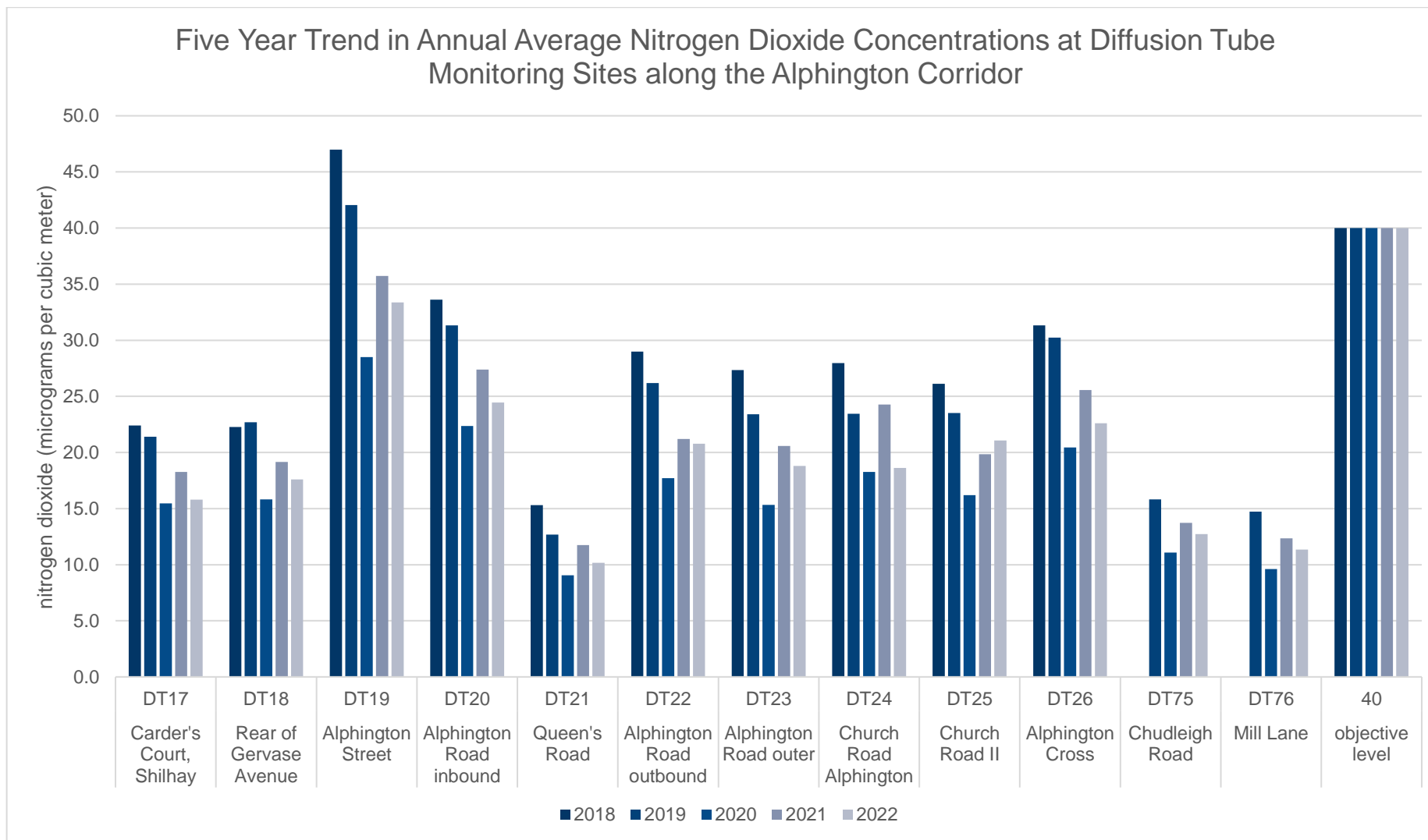
This figure presents NO₂ annual mean concentrations for sites in the city centre between years 2018 to 2022. There are no exceedances of the annual mean objective in 2022 and there is a general trend of reduction experienced across the sites.



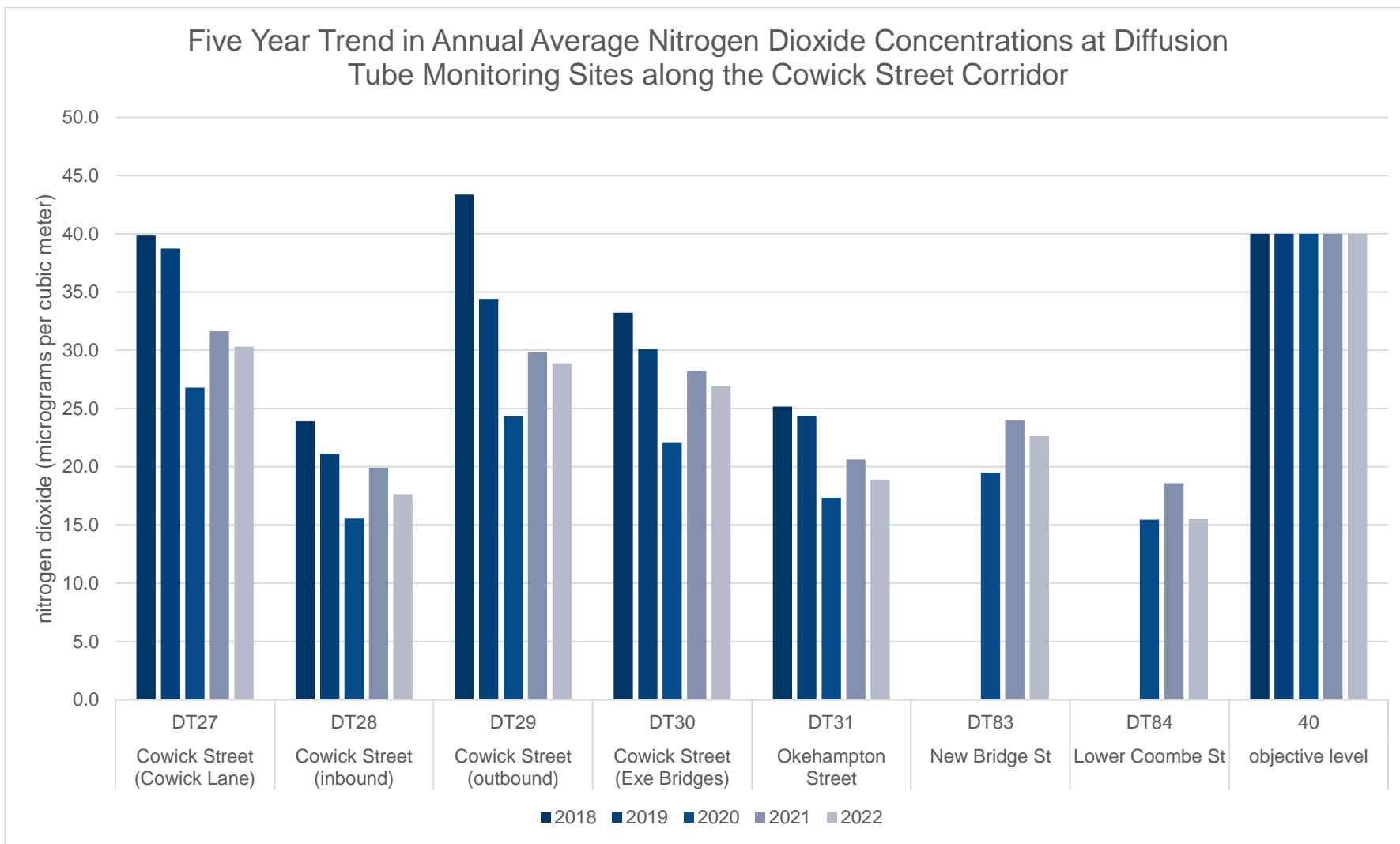
This figure presents NO₂ annual mean concentrations for sites along the Topsham Road corridor between years 2018 to 2022. There are no exceedances of the annual mean objective in 2022 and there is a general trend of reduction experienced across the sites.



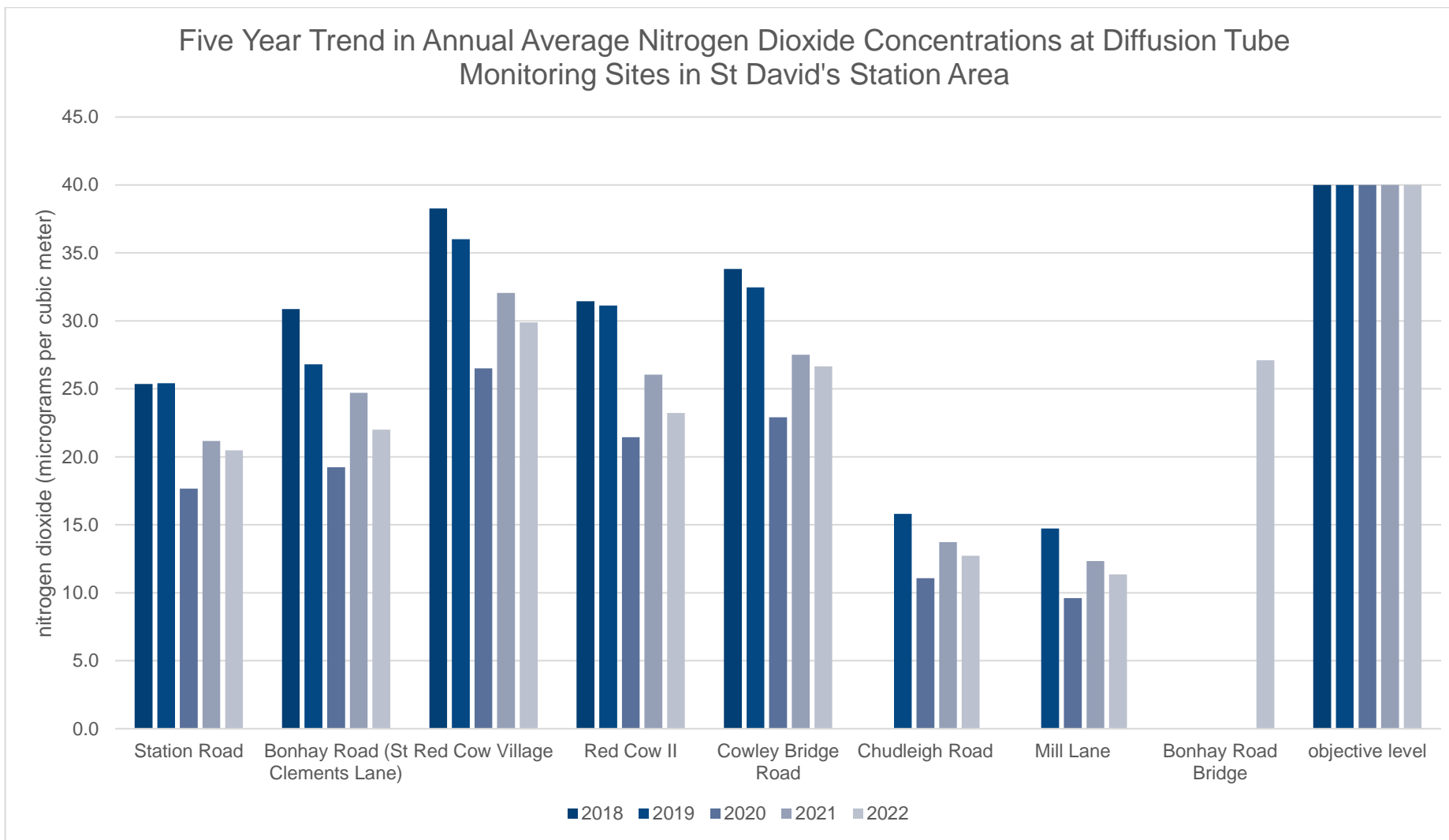
This figure presents NO₂ annual mean concentrations for sites along the Heavitree corridor between years 2018 to 2022. There is one exceedances of the annual mean objective in 2022 at DT57 (East Wonford Hill) and there is a general trend of reduction across the sites.



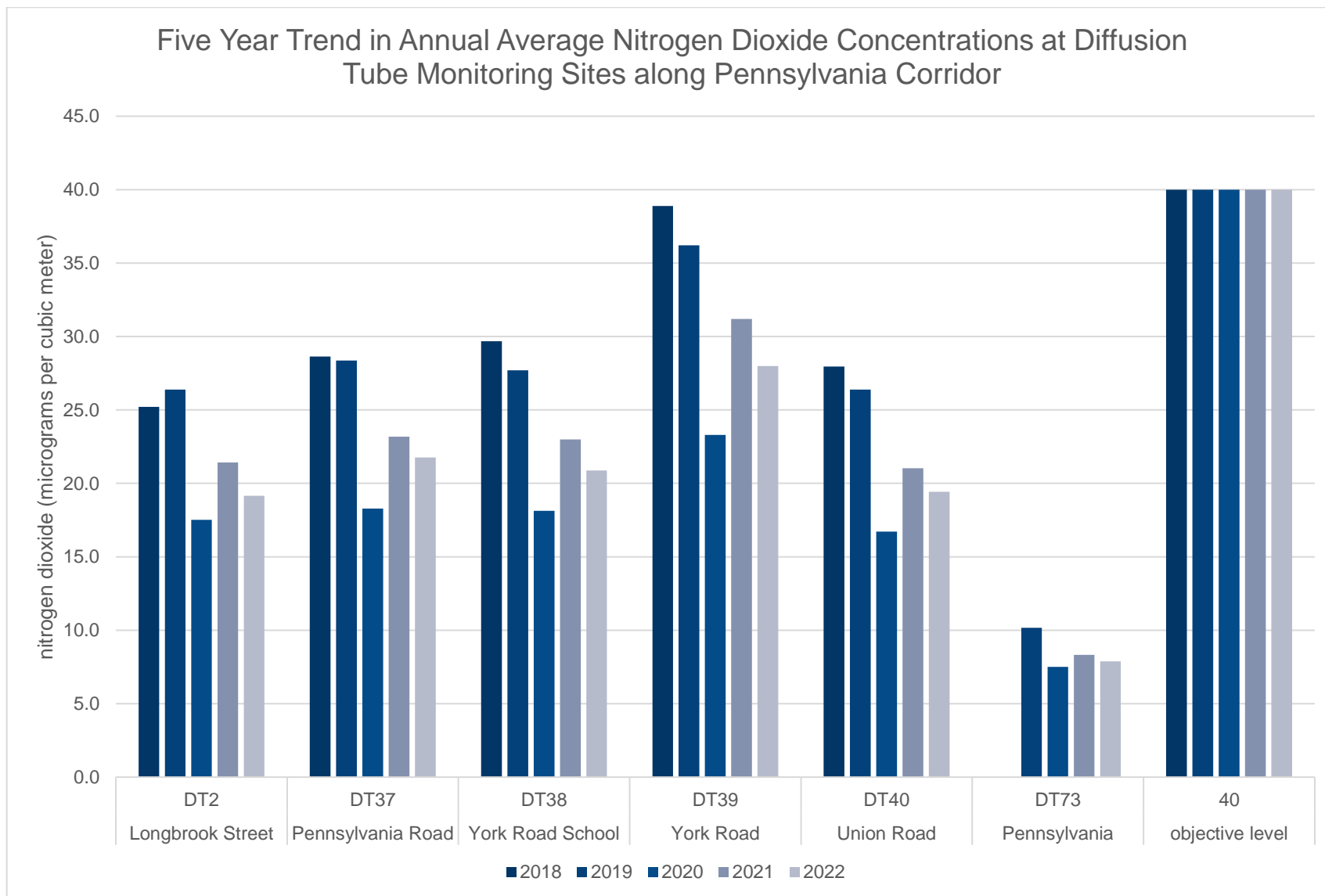
This figure presents NO₂ annual mean concentrations for sites along the Alphington corridor between years 2018 to 2022. There are no exceedances of the annual mean objective in 2022 and there is a general trend of reduction experienced across the sites.



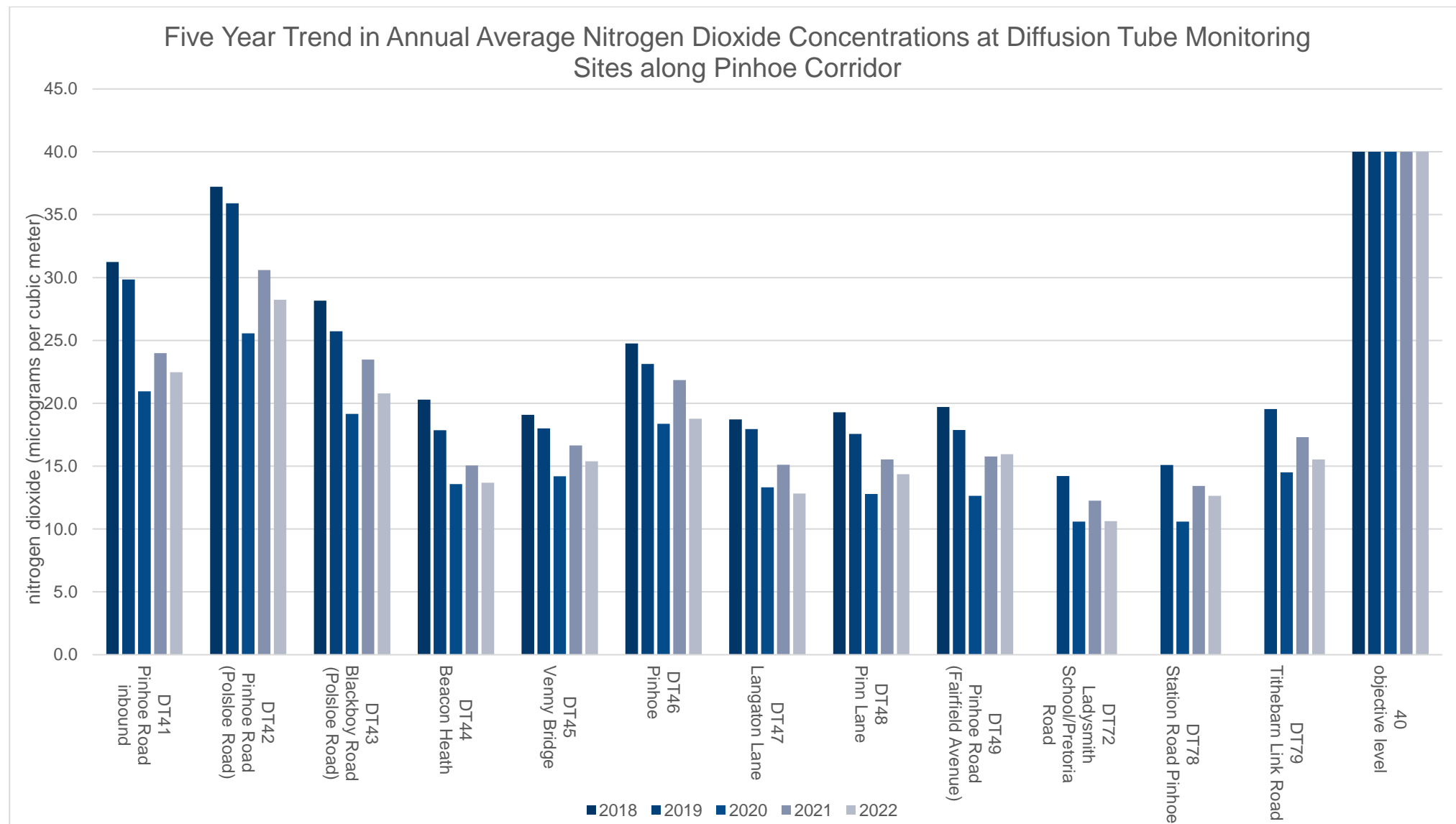
This figure presents NO₂ annual mean concentrations for sites along the Cowick Street corridor between years 2018 to 2022. There are no exceedances of the annual mean objective in 2022 and there is a general trend of reduction experienced across the sites.



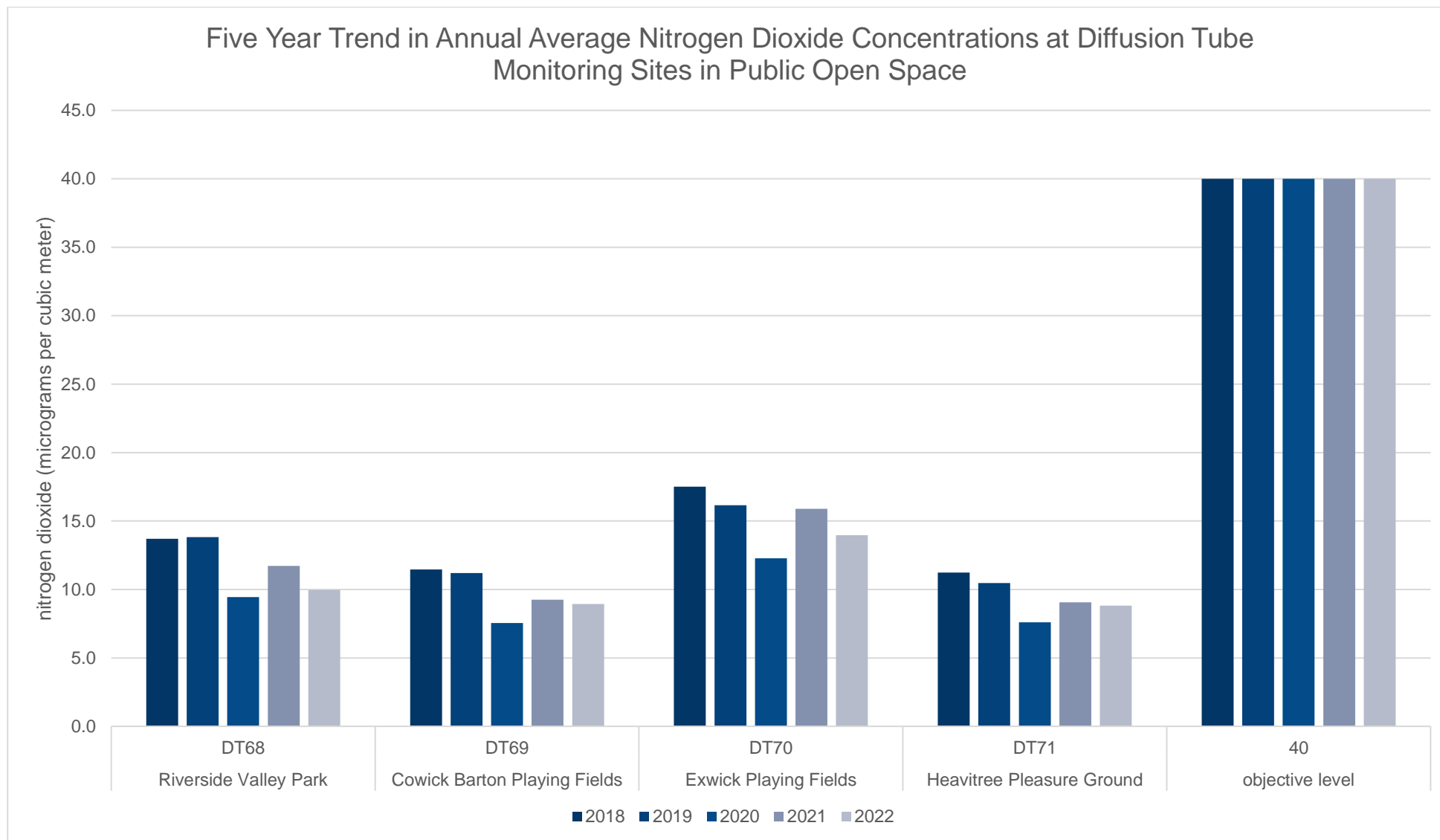
This figure presents NO₂ annual mean concentrations for sites in the St David's area between years 2018 to 2022. There are no exceedances of the annual mean objective in 2022 and there is a general trend of reduction experienced across the sites.



This figure presents NO₂ annual mean concentrations for sites in the Pennsylvania area between years 2018 to 2022. There are no exceedances of the annual mean objective in 2022 and there is a general trend of reduction experienced across the sites.



This figure presents NO₂ annual mean concentrations for sites along the Pinhoe corridor between years 2018 to 2022. There are no exceedances of the annual mean objective in 2022 and there is a general trend of reduction experienced across the sites.



This figure presents NO₂ annual mean concentrations for sites in public open space between years 2018 to 2022. There are no exceedances of the annual mean objective in 2022 and there is a general trend of reduction experienced across the sites.

Exeter City Council

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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
CM1	291939	92830	Kerbside		97.2	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%).

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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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
CM1	291939	92830	Kerbside		54.8	17.7	15.8	14.1	13.9	17.1 (19.22 annualised)
CM2	291670	91773	Roadside		99	16.7	15.1	11.5	12.0	14.7

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22 (annualised result shown in brackets)

Notes:

The annual mean concentrations are presented as µg/m³.

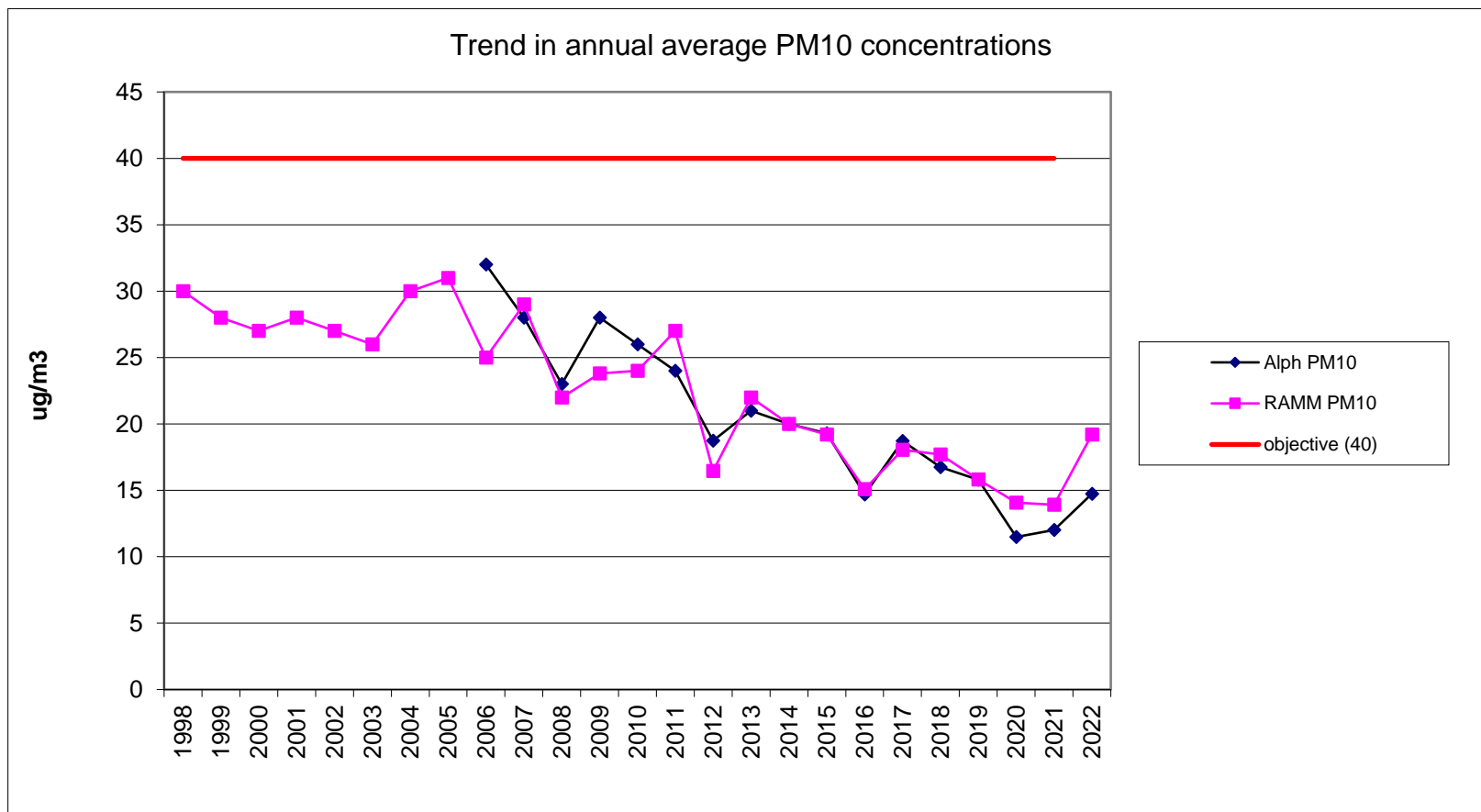
Exceedances of the PM₁₀ annual mean objective of 40µg/m³ are shown in **bold**.

All means have been “annualised” as per LAQM.TG22 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



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This figure presents PM₁₀ annual mean concentrations for the two monitoring sites in Exeter between years 1998 and 2022. There are no exceedances of the annual mean objective in 2022 although concentrations have increased since 2021. Otherwise there is a general trend of reduction experienced across both sites.

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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
CM1	29193	92830	Kerbside		54.8	0 (28.8)	0 (21.2)	1	1	2 (29.9)
CM2	291670	91773	Roadside		99	1	4	0 (19.2)	0	1

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 2022 (%) ⁽²⁾	2018	2019	2020	2021	2022
CM1	291939	92830	Kerbside		54.8		10	8.6	8.4	11.1 (12.7 annualised)
CM2	291670	91773	Roadside		99	9	9.5	6.8	7.5	9

Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22 (annualised data in brackets)

Notes:

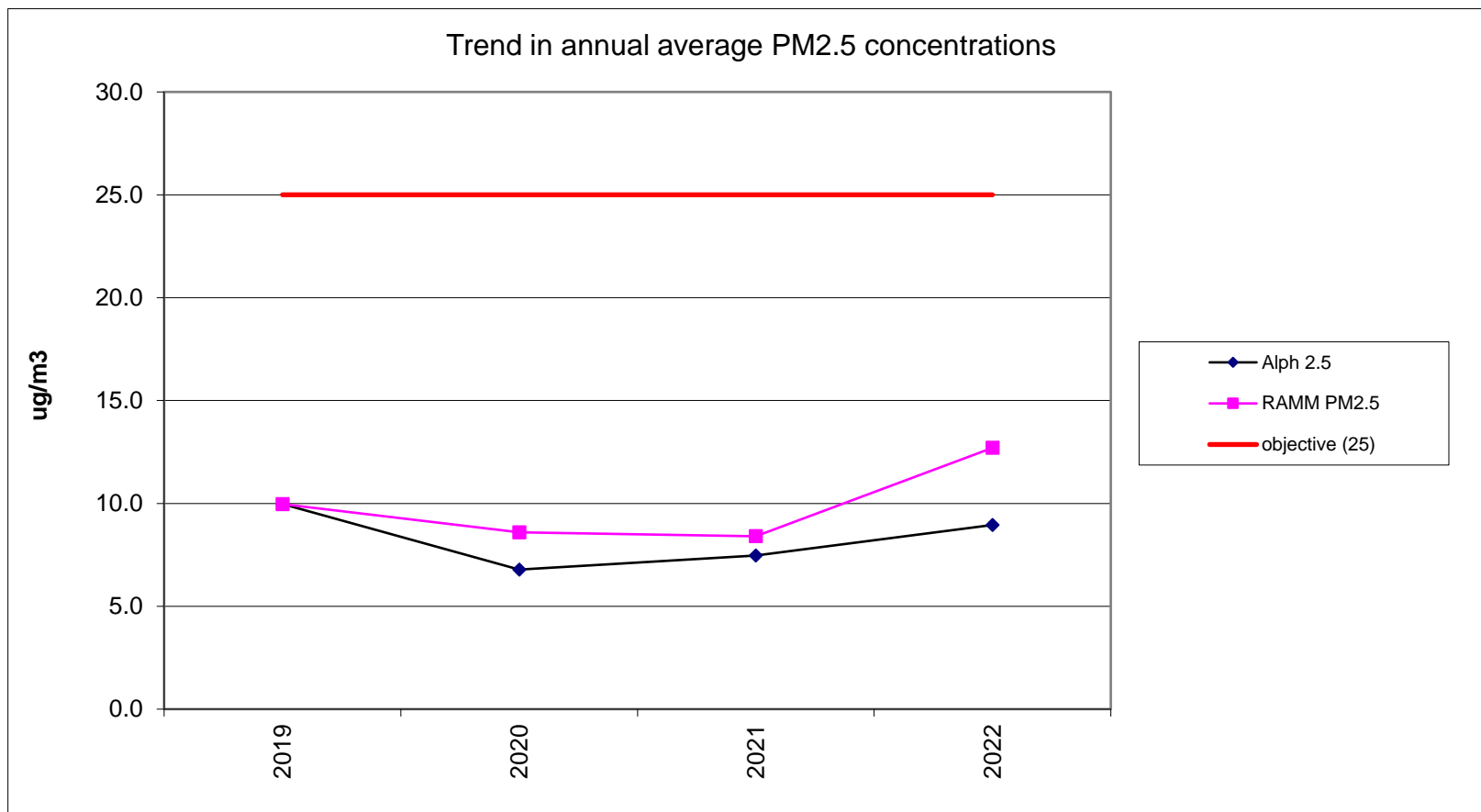
The annual mean concentrations are presented as µg/m³.

All means have been “annualised” as per LAQM.TG22 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



This figure presents PM_{2.5} annual mean concentrations for the two monitoring sites in Exeter between years 2019 and 2022. There are no exceedances of the annual mean objective in 2022 although concentrations have increased since 2021. There is no clear trend over the four year period.

Exeter City Council

Table A.9 – O₃ 2022 Monitoring Results

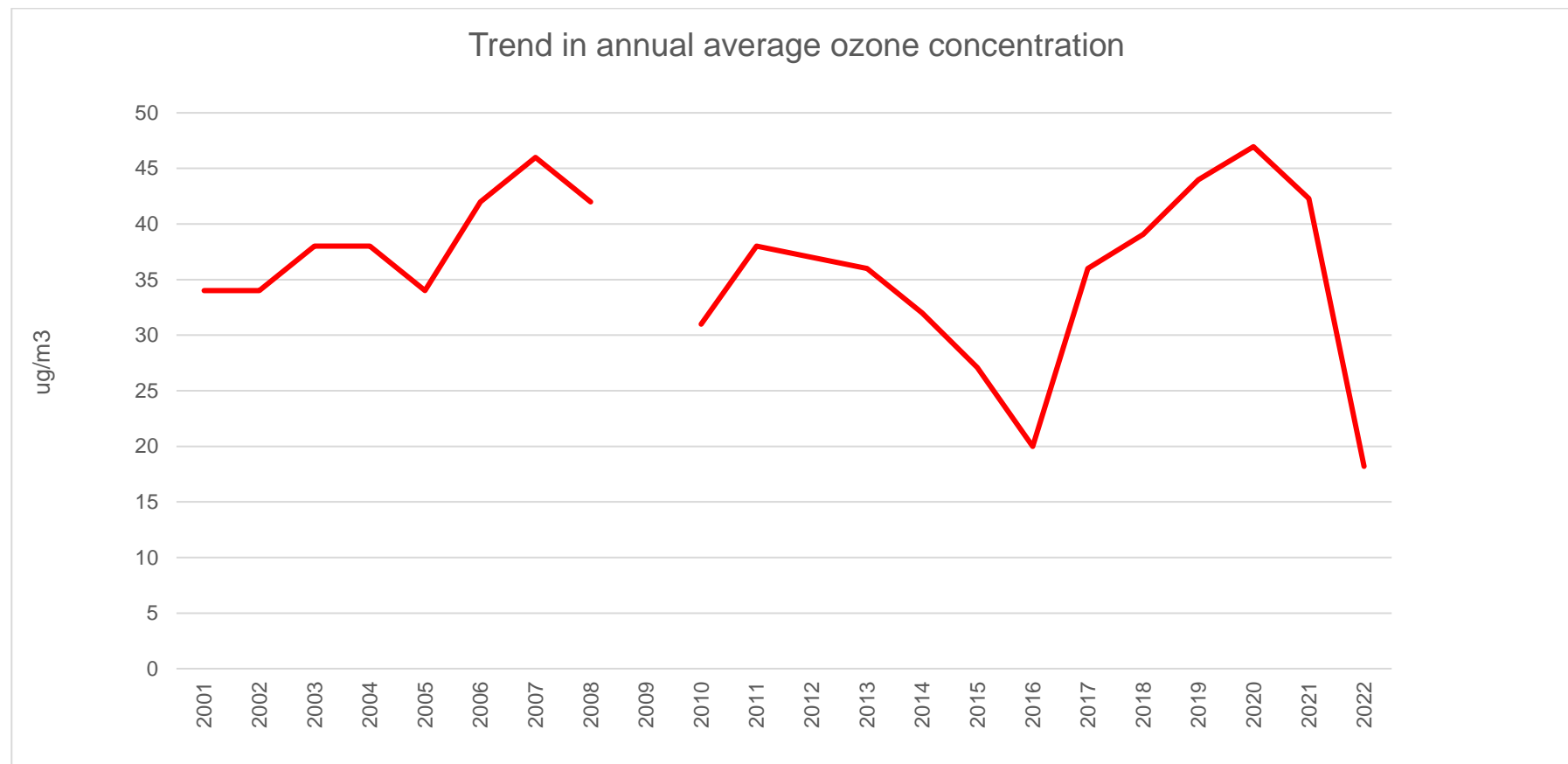
Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2022 (%) ⁽²⁾	2018 O ₃ 8-hour mean > 100 (µg/m ³)	2019 O ₃ 8-hour mean > 100 (µg/m ³)	2020 O ₃ 8-hour mean > 100 (µg/m ³)	2021 O ₃ 8-hour mean > 100 (µg/m ³)	2022 O ₃ 8-hour mean > 100 (µg/m ³)
CM1	291939	92830	Kerbside		97.1	12	11	87	0	0

Notes:

(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.4 – Trends in Annual Mean O₃ Concentrations



This figure presents O₃ annual mean concentrations between years 2001 and 2022. (Note that there is no local air quality objective for annual mean O₃ concentrations so this data is presented for information only). There is no clear trend over the entire period although concentrations have fallen since 2020.

Appendix B: Full Monthly Diffusion Tube Results for 2022

Table B.1 – NO₂ 2022 Diffusion Tube Results (µg/m³)

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.78	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT1	292199	92814	32.5	12.3	23.6	20.1	17.5	13.9	15.0	19.2	17.5	18.6	24.6	29.1	20.3	15.8	-	
DT2	292315	93016	32.4	27.1	26.2	23.6	19.8	18.4	17.6	22.5	22.7	25.9	31.4	29.1	24.7	19.2	-	
DT3	292185	93049	31.5	28.5	26.4	21.5	22.7	20.9	22.6	24.3		26.2	33.1	30.0	26.2	20.3	-	
DT4	291779	93011	31.7	21.7	16.6	20.8	16.1		16.0	18.8	20.4	21.3	26.4	26.9	21.5	16.7	-	
DT5	291944	92826	32.9	18.6	27.8	22.1	16.8	17.9	18.4	22.4	24.6		24.2	29.2	-	-	-	Duplicate Site with DT5 and DT6 - Annual data provided for DT6 only
DT6	291944	92826	34.2	19.9	27.5	21.0	17.8	17.6	18.6	24.2	22.0		21.5	28.7	23.1	17.9	-	Duplicate Site with DT5 and DT6 - Annual data provided for DT6 only
DT7	291984	92626	31.6	37.8	24.0	20.6	15.9	16.7	16.2	21.2	20.6	22.4	27.3	27.9	23.5	18.2	-	
DT8	291895	92569		29.9	31.4	30.5	26.5	28.4	30.2	30.8	33.6	31.2	35.3	34.8	31.1	24.1	-	
DT9	291943	92511	36.7	24.7	28.2	22.9	24.1	22.4	22.9	24.1	27.2	25.5	30.8	31.6	26.8	20.7	-	
DT10	291833	92433	37.2	24.9	31.6	24.3	20.9	20.8	21.4	26.0	27.2	29.0	30.3	29.5	26.9	20.9	-	
DT11	292291	92292	40.9	28.3	31.0	28.2	21.9	21.7	22.6	28.6	27.1	30.0	34.4	36.3	29.2	22.7	-	
DT12	292422	92320	44.1	28.5	29.2	25.0	23.3		22.2	26.0	25.4	25.1	42.2	36.5	29.8	23.1	-	
DT13	292590	92743	29.9	19.5	23.5	18.7	13.6	12.1	13.8	18.1	18.5	19.7	23.3	26.2	19.7	15.3	-	
DT14	292832	92731	30.6	15.5	21.4	19.0	14.1	13.5	14.3	18.0	19.0	17.0	20.8	24.9	19.0	14.7	-	
DT15	292703	92807		28.8	37.9	33.0	24.0	26.0	26.1	32.5	33.0	29.9	34.9	36.2	31.1	24.1	-	
DT16	292378	92039	41.3	26.3	31.5	26.3	22.9	23.3	24.1	27.4	27.9	26.1	31.9	32.3	28.4	22.1	-	
DT17	291699	92091	29.4	21.8	20.7	19.1	16.4	15.7	15.5	18.4	16.5	19.6	25.7	25.7	20.4	15.8	-	
DT18	291657	91973	30.0	22.7	22.6	19.6	18.2	15.4	20.0	22.9	23.3	23.3	27.2	27.2	22.7	17.6	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.78	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT19	291669	91812	43.8	35.5	46.4	43.9	35.5	37.0	42.3	52.1	45.2	42.1	47.6	45.1	43.0	33.4	-	
DT20	291532	91349	39.5	34.0	29.4	29.1	25.8	25.9	29.2	32.5	31.9	30.5	36.4	34.3	31.5	24.5	-	
DT21	291460	91390	16.3	10.6	16.4	13.1	8.6	8.6	9.6	13.4	12.4	13.3	15.5	19.5	13.1	10.2	-	
DT22	291509	91151	29.5	21.2	34.2	28.3	20.2	21.5	23.0	31.3	26.2		30.2	29.3	26.8	20.8	-	
DT23	291518	90813	28.3	18.2	32.5	24.0	18.5	19.9	20.1	25.2	23.3	25.5	24.7	30.7	24.2	18.8	-	
DT24	291691	90425	31.5	22.3	28.1	23.0	19.0	19.3	19.0	25.4	24.5	22.1	25.0	29.0	24.0	18.6	-	
DT25	291767	90160	34.3	30.6	27.5	24.4	23.0	23.8	23.0	27.2	25.4	27.7	28.7	30.6	27.2	21.1	-	
DT26	291520	90531	39.6	32.4	28.5	27.4	25.6	25.8	25.8	28.1	23.4	27.5	36.6		29.2	22.6	-	
DT27	290864	91725	40.9	39.6	39.3	35.9	34.0	33.9	34.2	39.9	36.4	42.6	49.9	42.8	39.1	30.3	-	
DT28	291249	91874	31.6	18.4	25.2	23.2	17.8	17.2	17.7	24.1	22.6	22.0	26.0	27.1	22.7	17.6	-	
DT29	291376	91944	42.9	35.2	36.0	38.9	31.1	30.6	31.0	42.8	36.9	41.6	42.0	38.1	37.3	28.9	-	
DT30	291500	92055	45.6	36.3		32.5		28.1	30.3	35.1	33.6	32.5	38.4		34.7	26.9	-	
DT31	291351	92169	29.3	22.7	27.2	23.6	20.2	20.4	20.9	24.9	24.4	23.5	28.4	26.7	24.3	18.9	-	
DT32	290826	93598	30.0	27.9	29.2	24.2	22.4	20.5	22.1	25.5	23.3	29.1	32.7	30.0	26.4	20.5	-	
DT33	291253	93299	40.1	28.0	28.9	28.0	24.4	22.4	23.8	26.8	29.8	24.7	33.4	30.2	28.4	22.0	-	
DT34	291242	93483	44.8	36.2	37.4	36.0	34.4	33.1	36.5	39.1	40.3		47.6	38.8	38.6	29.9	-	
DT35	291272	93468	33.9	34.3	30.8	27.0	27.1	27.1	28.3	29.7	28.4	32.1		31.0	30.0	23.2	-	
DT36	291054	94399	39.8	36.1	37.1	30.8	27.6	26.8	29.2	32.8	33.1	38.7	46.7	33.7	34.4	26.6	-	
DT37	292391	93291	38.3	26.2	33.2	25.2	23.3	19.1	21.5	27.9	26.4	30.1	32.3	33.5	28.1	21.8	-	
DT38	292469	93245	33.1	26.1	29.6	23.3	23.7		21.2	23.2	23.7	26.6	32.6	33.0	26.9	20.9	-	
DT39	292579	93146	51.9	34.0	39.7	37.0	28.2		28.0	31.2	31.9	32.7	40.8	41.8	36.1	28.0	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.78	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT40	293047	93877	32.9	20.4	29.8	22.9	20.2	17.8	20.4	26.1	23.9	29.4	29.0	28.1	25.1	19.4	-	
DT41	293405	93395	26.1	33.0	31.1	27.5	24.5	23.4	23.8	28.8	27.6	32.1	36.8	33.1	29.0	22.5	-	
DT42	293251	93375	45.3	36.2	40.7	35.3	32.7	30.5	32.3	38.9	35.4	37.0			36.4	28.2	-	
DT43	293227	93356	39.1	28.7	26.7	23.1	21.4	21.1	20.2	24.2	25.4	26.0	30.8	35.1	26.8	20.8	-	
DT44	295068	94487	23.7	19.0	18.1	15.1	14.5	13.1	13.9	15.7	16.2	18.4	22.8	21.3	17.7	13.7	-	
DT45	295888	94101	26.1	18.4	21.7	18.3	18.4	16.6	15.3	18.2	17.3	20.1	24.6	23.2	19.8	15.4	-	
DT46	296418	94470	33.7		20.5	20.6	21.3	19.9	20.5	20.8	22.5	23.9	32.4	30.3	24.2	18.8	-	
DT47	296984	94327	19.5	15.5		17.3	12.8	12.9	13.1	18.3	14.3	17.5	19.5	21.1	16.5	12.8	-	
DT48	296494	93782	25.2	16.9	19.3	15.7	14.2	12.7	12.5	18.1	16.8	20.2	25.0	25.7	18.5	14.4	-	
DT49	295413	93689	29.9	17.8	46.9	18.5	13.2	11.6	12.1	18.3	16.1	16.6	21.4	24.6	20.6	16.0	-	
DT50	293091	92825	21.5	12.8	15.6	12.2	10.0	8.3	8.8	11.2	11.7	13.7	16.9	20.2	13.6	10.5	-	
DT51	293448	92419	55.3	31.1	47.1	36.8	27.2	26.4	27.3	39.1	35.5	33.2	33.9	37.6	35.9	27.8	-	
DT52	293418	92497	54.9	49.1	39.3	37.8	36.3	34.5	38.3	37.9	39.2	40.1	50.2	45.2	41.9	32.5	-	
DT53	293533	92473	49.9	38.8	39.7	33.4	27.7	27.8	28.3	32.8	34.9	33.6	39.2	37.6	35.3	27.4	-	
DT54	293738	92396	52.6	48.5	43.4	40.9	41.4	38.8	37.4	44.4	38.0	47.2	48.6	41.3	43.5	33.8	-	
DT55	293781	92409	36.6	25.2	27.7	26.3	23.7	19.7	20.5	26.5	26.1	27.0	31.2	32.3	26.9	20.8	-	
DT56	294043	92359	48.9	44.2	37.7	33.9	35.5	34.8	34.1	40.3	31.4	46.1	47.6	41.4	39.7	30.8	-	
DT57	294410	92310	56.6	58.4	49.2	53.0	54.3	46.8	47.2	54.4	48.4	51.8	58.4	50.7	52.4	40.6	-	
DT58	295203	92378	45.9	45.9	43.1	39.1	34.6	35.3	36.3	41.5	39.4	39.8	47.8	45.7	41.2	31.9	-	
DT59	295191	92395	26.9	18.0	22.7	18.4	13.7	13.7	14.5	20.2	16.4	18.8	23.4	24.8	19.3	15.0	-	
DT60	295466	92365	40.1	30.2	38.9	36.0	26.5	26.5	25.1	34.9	30.2	30.9	33.3	37.7	32.5	25.2	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.78	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT61	295636	92232	30.4	20.5	27.5	21.5	19.1	16.7	19.9	21.8	21.7	22.8	25.8	25.0	22.7	17.6	-	
DT62	295710	90571	26.3	14.8	21.0	16.9	13.7	11.5	13.7	19.4	17.1	15.6	18.9	23.7	17.7	13.7	-	
DT63	294694	90001		24.8	15.4		18.2	19.4	21.2	22.5	23.5	24.0	27.8	28.4	22.5	17.5	-	
DT64	294652	89974	32.7	17.0	21.0	19.2	14.1	14.1	15.9	19.9	20.1	18.5	23.1	27.3	20.2	15.7	-	
DT65	296415	88477	35.4	19.0	28.4	24.1	19.6	18.9	20.8	27.8	24.5	20.9	23.0	29.0	24.3	18.8	-	
DT66	294227	90435	46.2	34.6	36.8	33.1	27.1	31.9	32.4	38.7	36.6	37.5	42.4	37.9	36.3	28.1	-	
DT67	293213	91245	31.6	19.8	31.8	24.4	19.9	19.2	20.7	25.8	23.4	27.5	26.5	28.1	24.9	19.3	-	
DT68	292291	91678	21.0	11.8	9.3	12.8	9.0	7.6	9.4	11.4	13.2	13.5	15.9	19.3	12.9	10.0	-	
DT69	291016	91304	19.6	9.0	15.2	10.5	6.8	7.2	7.1	10.4	10.4	11.2	12.9	18.1	11.5	8.9	-	
DT70	291298	92593	27.3	12.4	22.1	17.2	13.2	12.6	14.6	19.3	19.7	16.9	19.2	21.7	18.0	14.0	-	
DT71	294387	92611	17.0		12.0	9.3			1.8		15.0	10.9	21.6	15.7	12.9	8.8	-	
DT72	293617	93090	23.5	13.6		11.7	10.2	9.1	9.4	11.7	12.9	14.1	17.2	17.2	13.7	10.6	-	
DT73	293052	94185	15.5	9.6	12.9	8.5	6.6	6.2	5.9	7.8	8.2	12.2	13.0	15.7	10.2	7.9	-	
DT74	292056	93043		11.8	14.1	11.0			8.2	10.5	10.8				11.1	8.4	-	
DT75	291721	89727	25.3	13.9	19.8	15.7	11.2	10.9	12.8	17.1	15.1	15.4	17.1	22.7	16.4	12.7	-	
DT76	291555	90449	23.4	13.9	16.4	14.8	10.8		10.7	9.6	13.6	11.0	17.1	19.8	14.6	11.3	-	
DT77	292553	93082	38.7	26.1	27.7	23.8	22.6	19.8	20.9	23.7	23.6	27.9	33.1	31.2	26.6	20.6	-	
DT78	296415	94165	22.2	16.8	18.5	16.2	13.4	12.6	12.4	16.0	13.3	17.0		20.9	16.3	12.6	-	
DT79	296827	93886	25.6	17.3	23.4	19.9	14.3	14.1	14.0	20.7	17.8	20.6	24.0	28.5	20.0	15.5	-	
DT80	295967	88876	32.2	19.8	25.1	20.2	15.6	13.2	15.7	21.3	21.5	23.4	24.3	26.6	21.6	16.7	-	
DT81	292637	91991	26.6	14.4	18.4	13.9	11.3	10.9	11.0	13.4	14.4	14.2	18.9	22.2	15.8	12.2	-	

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data	Annual Mean: Annualised and Bias Adjusted 0.78	Annual Mean: Distance Corrected to Nearest Exposure	Comment
DT82	292847	92911	23.6	17.9	16.3	13.3	10.4	8.8	10.0	12.3	13.4	15.9	20.5	24.6	15.6	12.1	-	
DT83	291655	92258	39.1	28.0	32.1			20.3	23.5	27.9	28.8	27.6	31.1	33.6	29.2	22.6	-	
DT84	291897	92217	32.3	19.5	21.5	20.4	15.0	14.6	16.5	19.0	22.3	16.0	19.1	23.9	20.0	15.5	-	
DT85	291375	92935	44.6	39.3	37.8	31.8	29.6	29.1	31.2	35.2	35.2	31.6	37.9	36.5	35.0	27.1	-	

- 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.TG22.
- 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 2022 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 2022

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 2022

Exeter City Council has not completed any additional works within the reporting year of 2022.

QA/QC of Diffusion Tube Monitoring

Exeter City Council uses Gradko diffusion tubes (20% TEA in water). Gradko laboratories (GRADKO International Ltd., St. Martins House, 77 Wales Street, Winchester, Hants. SO23 0RH) 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 2022, the monitoring was completed in adherence with the 2022 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).

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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 tubes at Heavitree pleasure Grounds (DT71) and Northernhay Gardens (DT74) were below 75% (67% and 48% respectively) so these have 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.1.

Table C.1 – 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 Name	Average Annualisation Factor	Raw Data Annual Mean	Annualised Annual Mean
DT71	0.8941	0.8258	0.9217	-	0.8805	12.9	11.4
DT74	1.0358	0.8808	1.0241	-	0.9802	11.1	10.8

Diffusion Tube Bias Adjustment Factors

The diffusion tube data presented within the 2022 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.TG22 provides guidance with regard to the application of a bias adjustment factor to correct diffusion tube monitoring. 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/NO_2 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 local bias adjustment factor of 0.77 to the 2022 monitoring data. This means that the diffusion tubes over-estimate actual concentrations when compared to the reference method. This factor is derived from the co-located diffusion tubes at the RAMM continuous analyser (CM1). The national bias adjustment

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factor is similar, at 0.83, which has been obtained from the spreadsheet version 03/22, for Gradko diffusion tubes (20% TEA in water).

The local factor was chosen because the Exeter RAMM co-located tubes show good overall precision and data capture and are thought to be representative of local conditions.

A summary of bias adjustment factors used by Exeter City Council over the past five years is presented in

Table C.2. This has always been the local factor, except in 2018 and 2021 when data capture for the continuous analyser was low.

Table C.2 – Bias Adjustment Factor

Monitoring Year	Local or National	If National, Version of National Spreadsheet	Adjustment Factor
2022	Local	-	0.77
2021	National	03/22	0.84
2020	Local	-	0.74
2019	Local	-	0.89
2018	National	03/19	0.93

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	11				
Bias Factor A	0.77 (0.74 - 0.81)				
Bias Factor B	29% (23% - 35%)				
Diffusion Tube Mean ($\mu\text{g}/\text{m}^3$)	23.1				
Mean CV (Precision)	3.7%				
Automatic Mean ($\mu\text{g}/\text{m}^3$)	17.8				
Data Capture	98%				
Adjusted Tube Mean ($\mu\text{g}/\text{m}^3$)	18 (17 - 19)				

Notes:

A single local bias adjustment factor has been used to bias adjust the 2022 diffusion tube results.

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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 required distance correction during 2022.

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:

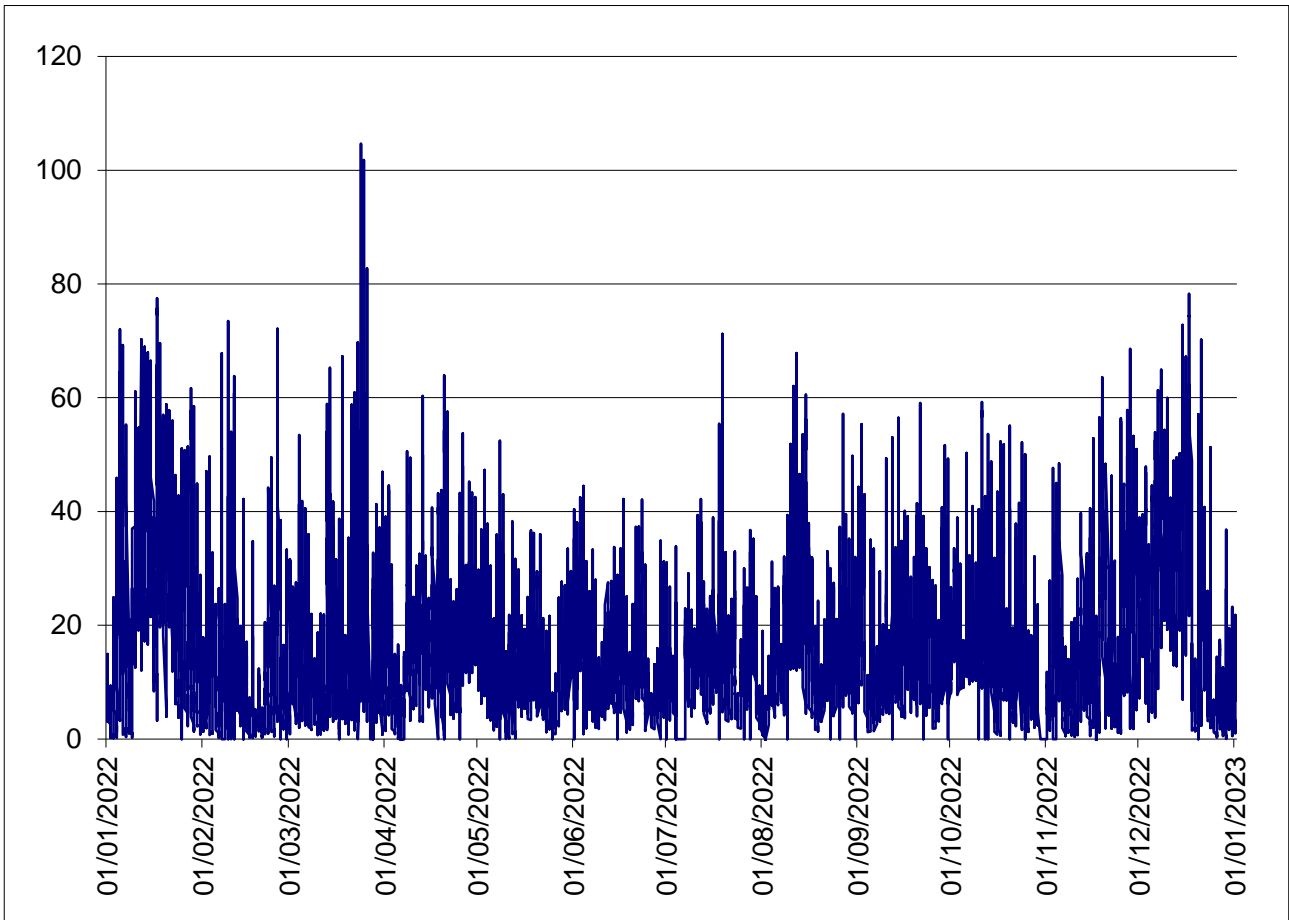
- Comparison of data with other pollutants and other appropriate AURN network sites (roadside sites and other sites in the south west),
- Final checking and deletion of data marked as possibly erroneous,
- Removal of data from unrepresentative periods of operation (e.g. road works in immediate vicinity 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 97.2% in 2022.

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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.

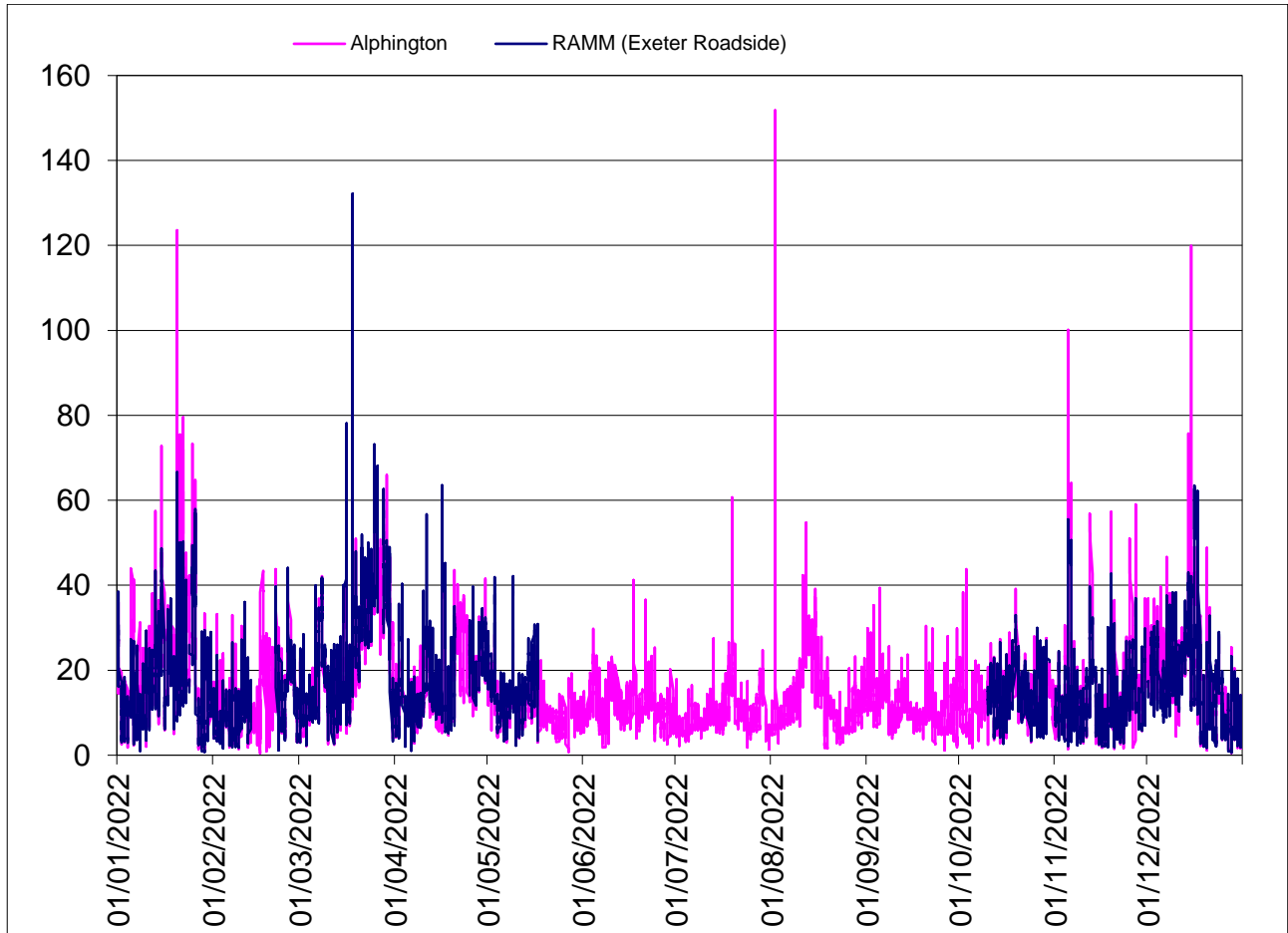
Figure C.1 Hourly NO₂ data from Exeter Roadside (RAMM) ($\mu\text{g}/\text{m}^3$)



This graph shows the hourly NO₂ data from the RAMM continuous analyser.

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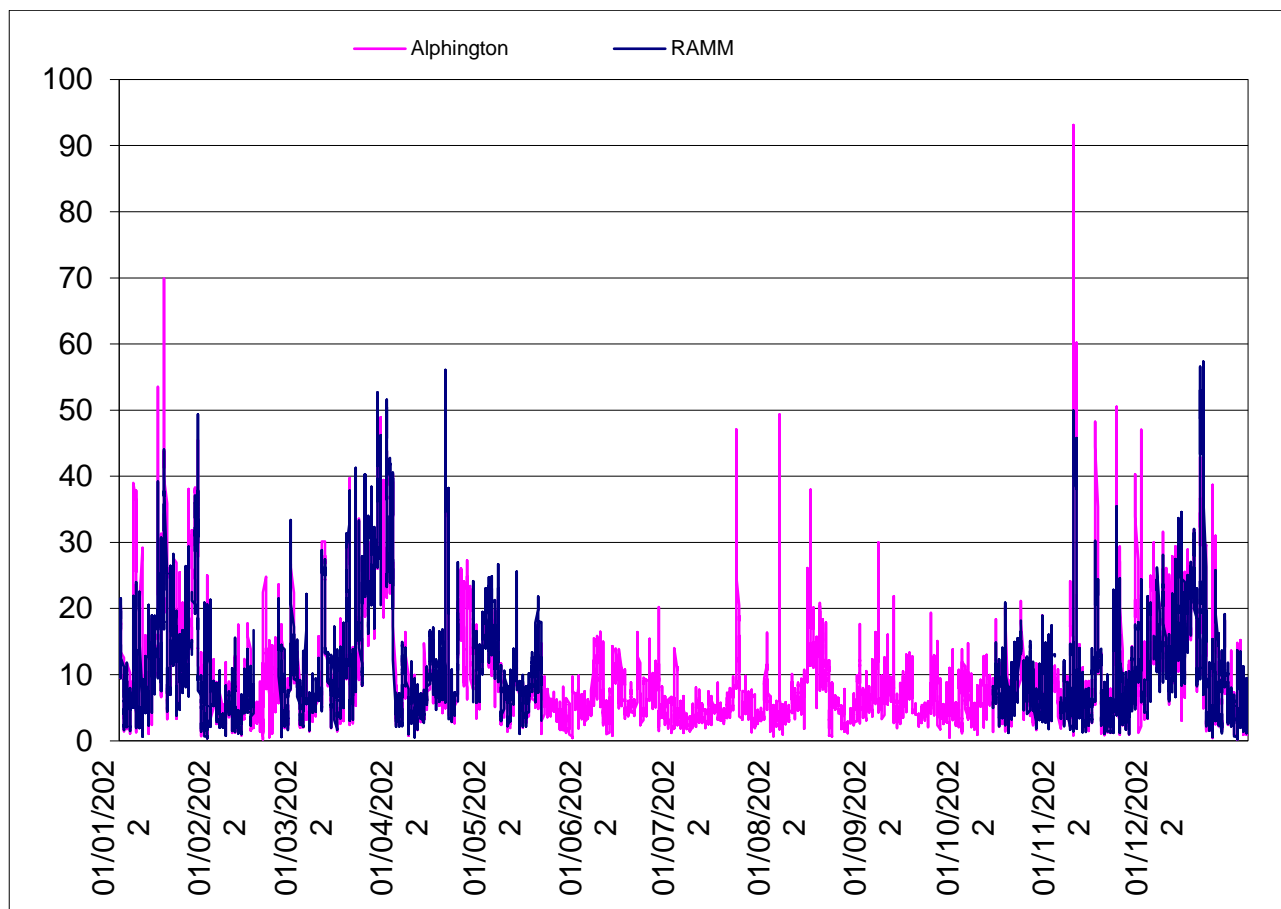
Figure C.2 Hourly PM₁₀ data from Exeter Roadside (RAMM) and Alphington Street (µg/m³)



This graph shows the hourly PM₁₀ data from the RAMM and Alphington Street continuous analysers.

Exeter City Council

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} monitors utilised within Exeter City Council do not require the application of a correction factor.

Automatic Monitoring Annualisation

Data capture from the PM₁₀ and PM_{2.5} continuous analyser at RAMM (Exeter Roadside CM1) was below 75% (55%) so these have been annualised using the method described in the Technical Guidance. Annualisation factors were gained using data from Alphington Street and from nearby AURN sites at Saltash Callington Road and Plymouth Centre for PM₁₀. For the annualisation of PM_{2.5}, Christchurch Barrack Road was also used. The sites chosen were identified as being within 50 miles of CM1, and with a data capture of over 75%. The lack of sites meeting these criteria means that both urban background

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(Plymouth Centre) and urban traffic (Alphington Street, Saltash and Christchurch) sites had to be used. A non-AURN site (Alphington Street) was included because of its local relevance. The annualisation factors for each site chosen are similar for all the sites except Saltash (PM2.5 only). Details of the calculation method undertaken are provided in Tables C.4 and C.5.

Table C.4 – PM10 Annualisation Summary (concentrations presented in $\mu\text{g}/\text{m}^3$)

Site ID	Annualisation Factor Plymouth Centre	Annualisation Factor Saltash Callington Road	Annualisation Factor Alphington Street	Annualisation Factor Site 4 Name	Average Annualisation Factor	Raw Data Annual Mean	Annualised Annual Mean
CM1	1.13	1.10	1.13	-	1.12	17.1	19.2

Table C.5 – PM2.5 Annualisation Summary (concentrations presented in $\mu\text{g}/\text{m}^3$)

Site ID	Annualisation Factor Plymouth Centre	Annualisation Factor Saltash Callington Road	Annualisation Factor Alphington Street	Annualisation Factor Christchurch Barrack Road	Average Annualisation Factor	Raw Data Annual Mean	Annualised Annual Mean
CM1	1.19	1.05	1.20	1.21	1.15	11.1	12.69

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.

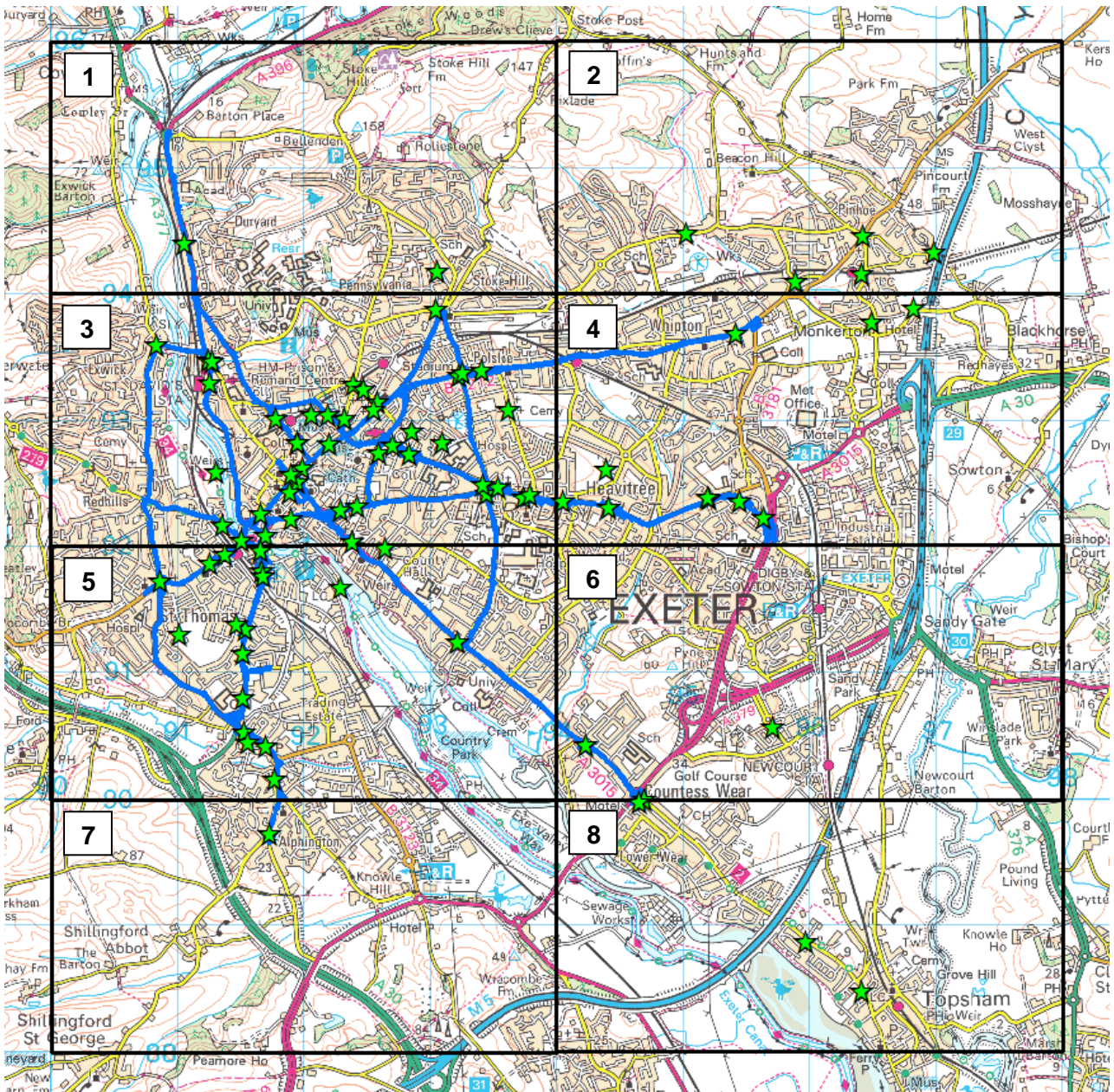
No automatic NO₂ monitoring locations within Exeter required distance correction during 2022.

Appendix D: Map(s) of Monitoring Locations and AQMAs

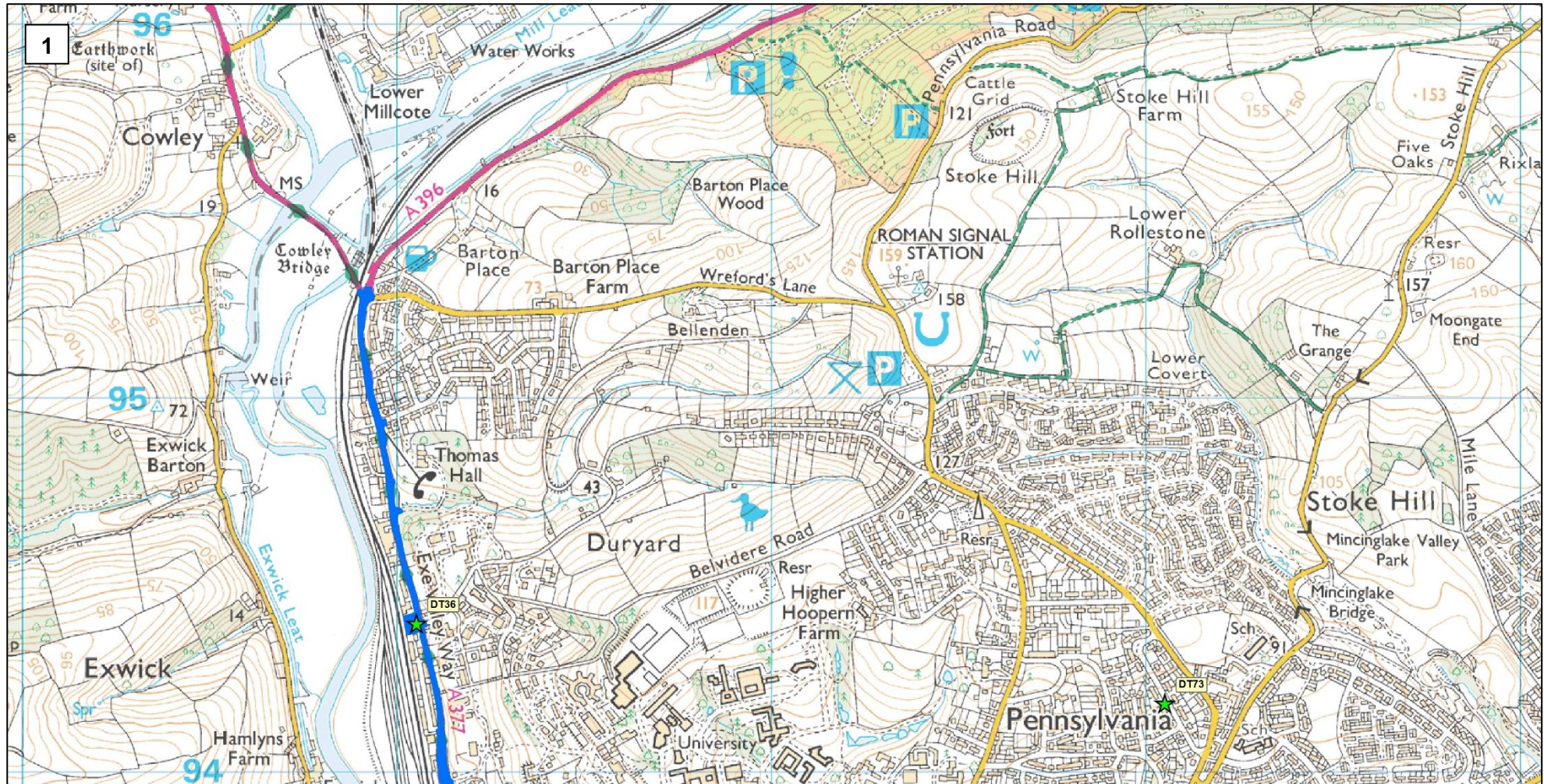
Figure D.1 – Map of Non-Automatic Monitoring Site

The monitoring locations and 2022 data can also be viewed using an online map [here](#).

Monitoring location = ★
AQMA = 



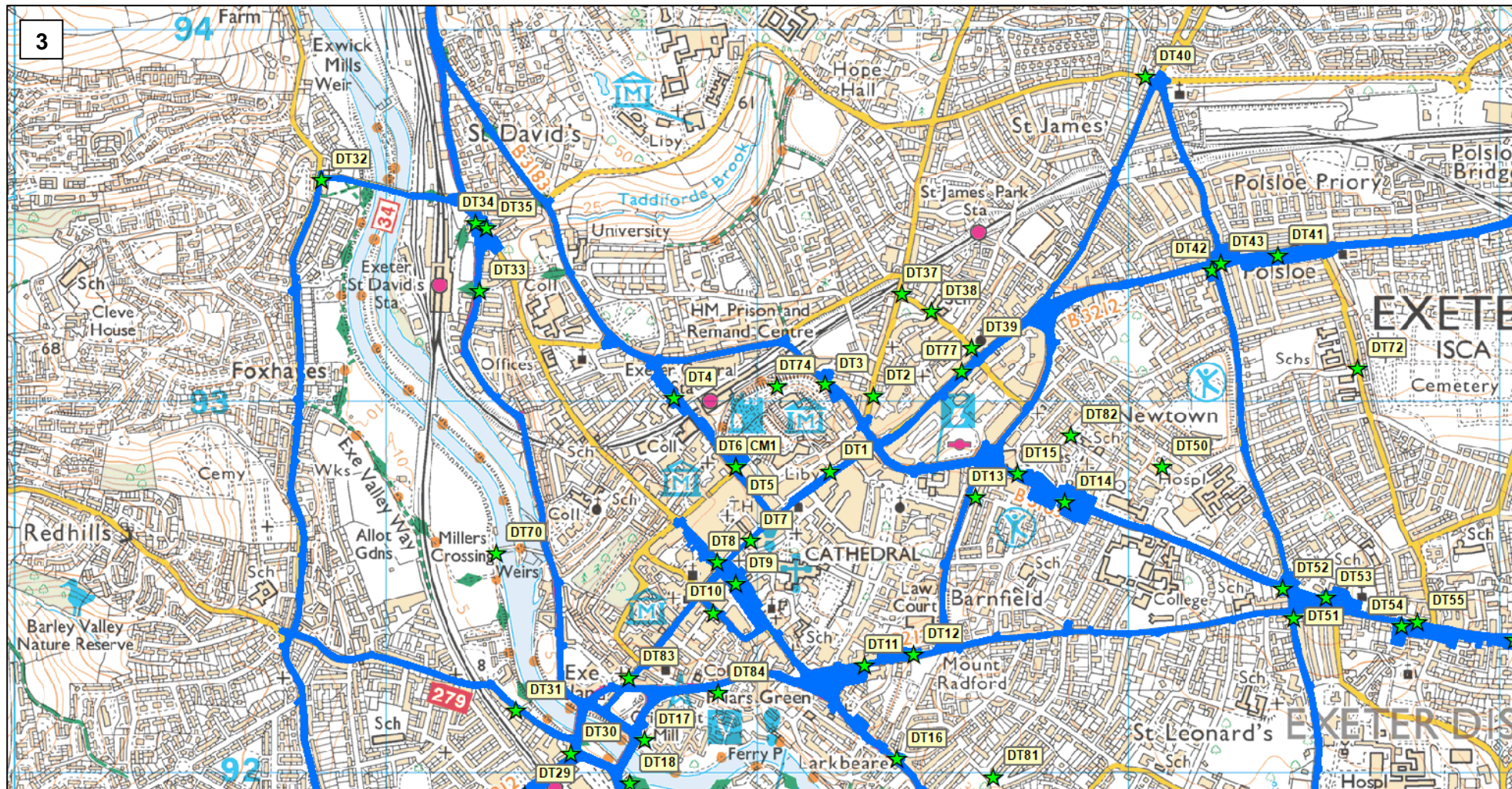
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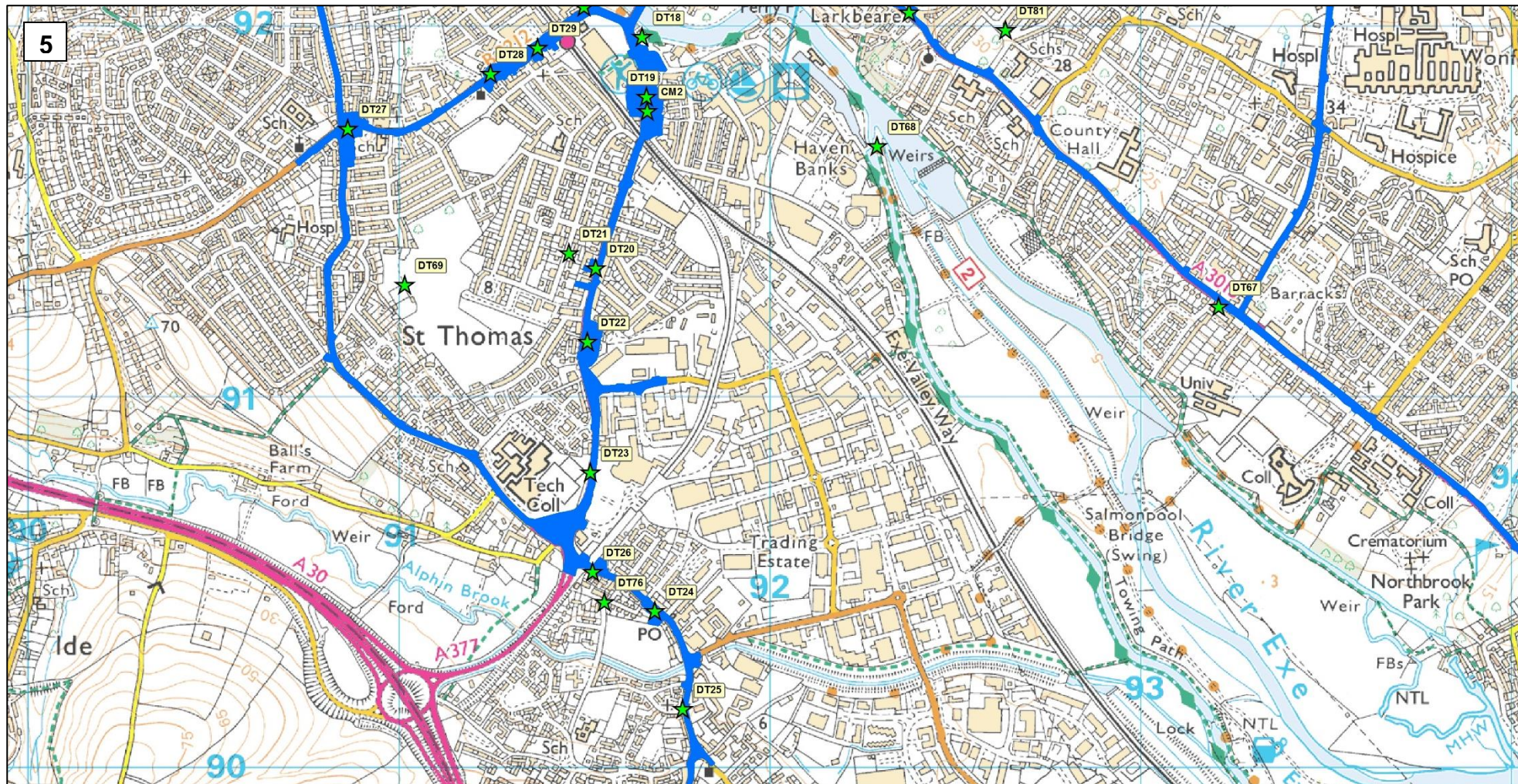
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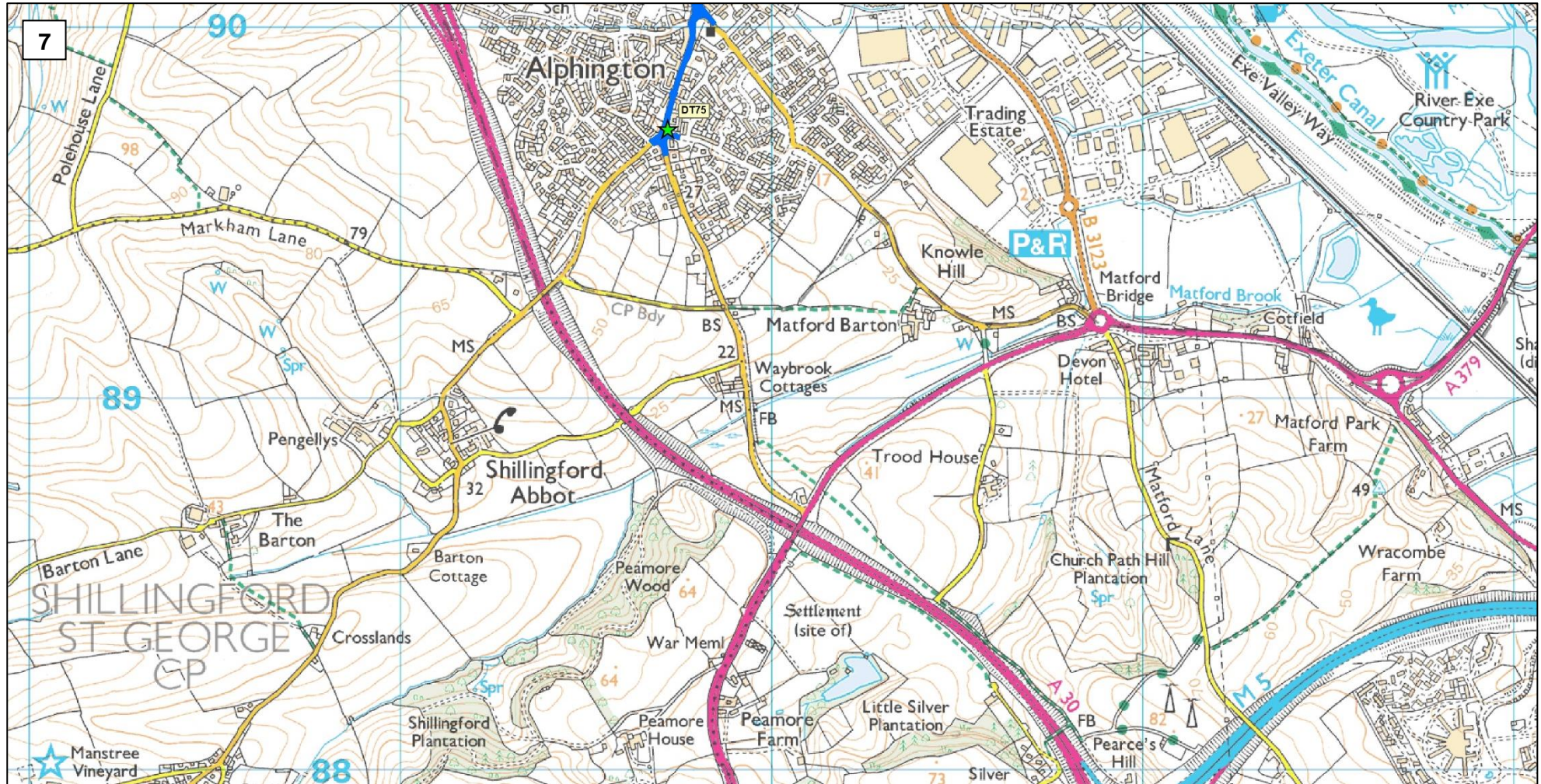
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Appendix E: Summary of Air Quality Objectives in England

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.TG22. August 2022. 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.PG22. August 2022. 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.](#)

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DEFRA Air Quality Grant-Funded Project

Heavitree Corridor Air Quality Virtual Sensors

Exeter's current air quality monitoring network comfortably achieves the legal requirements under the Environment Act 1995 to identify areas of non-compliance with the air quality objectives. However it does not provide the kind of high spatio-temporal resolution data that is visually engaging to the public, nor does it closely identify the sources of pollution. Traditionally this would have been done by either the use of dispersion models (to predict typical pollution levels based on historic inputs of traffic and weather data) or by the addition of expensive (c £10k each) real-time monitors.

This project proposes an alternative methodology, instead focussing on the development of virtual sensors trained by a few real-world sensors which will learn to predict pollution levels. A variety of both historic and near real time inputs will allow the virtual sensors to display near current estimates of pollution concentrations which will become more and more accurate as they learn from the real-world sensor data.

Currently only one site in Exeter exceeds the legal objectives for air pollution levels. This is at East Wonford Hill, nitrogen dioxide (NO₂) levels are above the relevant level. For this reason the project will focus on NO₂ in the Heavitree Corridor area. This will serve as a model template for other areas of highest needs, both for Exeter and other cities.

The project team will install new state-of-art Internet of Things (IoT) air quality sensors within the project area which will be used alongside the existing pollution monitors to:

- Build a robust data set from which the project team will create algorithms to inform virtual sensors to automatically estimate the air quality across the Heavitree corridor.
- Expose the rapid fluctuations of air quality across time. For reference, the diffusion tubes utilised by ECC take monthly averages of NO₂ concentrations whereas the new sensors will provide 15-minute average data in real-time.
- Help to establish patterns in concentrations which in turn will better inform what is causing localised and potentially short-lived high ambient concentrations (for example we will better understand the impact of congestion, road junctions etc)

The project team will then create a robust, simple, and digestible data dissemination pathway to help inform the local population about the air quality issues along the Heavitree corridor. The main aim of the dissemination pathway is to inspire behaviour change in individuals which should result in reduced NO₂ emissions and ambient concentrations.

The project is a partnership between Exeter City Council and Emerald Green Power. It will last two years. Because it has been funded by grant from DEFRA, the Council does not currently expect to have the funding available to continue or expand the project beyond this period.

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