

**EXETER CITY COUNCIL**  
**PLANNING MEMBER WORKING GROUP**  
**8 SEPTEMBER 2009**

**EXECUTIVE**  
**15 SEPTEMBER 2009**

**LOCAL DEVELOPMENT FRAMEWORK**  
**CORE STRATEGY CONSULTATION**

**1 PURPOSE OF REPORT**

- 1.1 To consider the content of a report on the City Council's Core Strategy for public consultation.

**2 BACKGROUND**

- 2.1 Members will be aware that the development plan system has been changed to require local authorities to prepare planning guidance on the future of the area through a Local Development Framework (LDF) instead of a Local Plan. The policies contained in the Adopted Exeter Local Plan First Review are "saved", i.e. remain part of the development plan for development management purposes, until they are replaced by policies in the LDF. The preparation of a Core Strategy is the first and most important stage in the preparation of the LDF.
- 2.2 The Core Strategy has been subject to consultation at Issues and Options and at Preferred Options stages but the submission of the Core Strategy to the Secretary of State has been delayed because of the desire for reasonable certainty on the scale of development likely to be required by the Regional Spatial Strategy (RSS) on adoption. As reported to Executive on 30 September 2008, the Secretary of State has increased the number of houses to be built in Exeter from the 12,000 recommended by the Panel who held the Examination in Public of the RSS, to 15,000 in the Proposed Changes. Although the RSS supports the approach in the emerging Core Strategy to focus any expansion of the City to the east and south west, Executive resolved that representations should be made to the Proposed Changes that the increase in the number of houses to be provided within the City is not soundly based on evidence of capacity.
- 2.3 The intention is to publish the Submission Core Strategy early next year, to which representations will be invited, followed by submission to the Secretary of State and public examination by a Planning Inspector. This programme is, however, dependent on clarification of the housing target to be set by the RSS. The latest delay in adoption of the RSS has been due to a legal challenge to the East of England RSS which may have implications for the South West RSS. Advice from the Government Office for the South West on the likely extent of the delay has been promised but is not yet available. If by the end of the year adoption still seems to be a long way off, the City Council will have to take a view on whether to proceed with publication of the Submission Core Strategy and, if so, on what basis, or to continue to wait.

- 2.4 Notwithstanding the above, the Government Office for the South West has advised that there should first be an additional consultation carried out to deal with new issues that have arisen. In particular, this includes the potential increase in housing numbers arising from the RSS and revised government guidance which allows the Core Strategy to allocate sites that are considered to be central to the achievement of the strategy.

### **3 WAY FORWARD**

- 3.1 Despite the City Council's significant reservations about the scale of development proposed there are strong reasons in favour of at least carrying out this additional consultation whilst waiting for the RSS. Members will be aware that the Government requires local authorities to be able to demonstrate a five year supply of housing land. If not, there is a presumption in favour of granting planning permission for housing development. As reported to Planning Committee in December 2008, a five year supply was only just achieved last year. If new allocations are not brought forward the Council will have great difficulty in resisting unsatisfactory housing proposals even if they are in areas protected by policies in the adopted Local Plan.
- 3.2 It is, therefore, important that the Core Strategy is able to make progress towards Submission to the Secretary of State as soon as the RSS is adopted. It would be unfortunate if, at that time, the additional consultation had still to be carried out. To achieve this, it is suggested that the Council could consult on the 12,000 dwellings target whilst also considering how, if required, the additional 3,000 dwellings may be achieved.
- 3.3 It is proposed that, following approval by Executive, this additional consultation should be carried out in October and November. Should the RSS be adopted before the consultation, the report would be amended to deal solely with the adopted target. Should adoption of the RSS appear imminent, the consultation would be delayed accordingly.

### **4 CONTENT OF THE REPORT**

#### **12,000 Dwellings**

- 4.1 The attached consultation paper outlines how the 12,000 target may be met through recent completions (2006-2009), current planning permissions, sites on previously developed land within the urban area, regeneration areas (Water Lane and the Grecian Quarter) and urban extensions on greenfield land at Newcourt, Monkerton/Hill Barton and Alphington (see Plans 1-3 of the consultation report). It is proposed that the urban extensions are identified as strategic allocations so that greater certainty on the planning framework in these areas is in place.
- 4.2 The report also sets out broad guidance on the infrastructure required, and the means of delivering that infrastructure, to enable the development proposed for the City as a whole to come forward.

#### **15,000 Dwellings**

- 4.3 To meet the additional 3,000 dwellings will require a reliance on windfalls but other areas will also have to be brought forward that are subject to current constraints or policy objection. These include Pinhoe Quarry, part of the

Devon & Cornwall Police HQ at Middlemoor, and land between Topsham and the M5.

- 4.4 The report explains that these areas will only be required towards the end of the plan period. In respect of land to the west of Topsham, the report emphasises that the development of this area is opposed because of coalescence and will only be brought forward if the 15,000 target is imposed. Even then, the proposal will be reviewed over the plan period to determine whether, as a result of completions and land availability elsewhere in the City, the release of this land is needed.
- 4.5 If these proposals are not considered acceptable, or windfalls are judged unlikely to achieve the capacity indicated, the only alternatives would be to build on the hills to the north and west of the City and/or on the valley parks, which would not accord with the strategy set out in the RSS, or to increase densities still further.
- 4.6 The capacity of the proposed urban extensions has been assessed at an average of 50 dwellings per hectare, as applied to the net developable area, in accordance with guidance in the RSS. Completions in the City over the last five years have achieved around this density overall. Increasing the average density is not recommended in view of Members' repeated expressions of concern over the potential impact on living conditions and environmental quality.
- 4.7 The attached report, therefore, explains that if an additional 3,000 dwellings have to be delivered, this should be achieved through windfalls and additional allocations, including development to the west of Topsham, rather than by building on the hills and valley parks or increasing densities.

## **5 ADVICE SOUGHT**

- 5.1 Members' views are requested on the content of the consultation report and on the proposal that the required additional consultation should be carried out in order to be able to make progress towards Submission as soon as the RSS is adopted, but only on the basis that the 12,000 dwellings target is demanding but achievable whilst the 15,000 target is a last resort.

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